DOCUMENT RESUME

ED 192 464 EA 012 984

AUTHOR	McDonnell, Lorraine M.; McLaughlin, Milbrey W.
TITLE	Program Consolidation and the State Role in ESEA Title IV.
INSTITUTION	Rand Corp., Santa Monica, Calif.
SPONS AGENCY	Office of Education (DHEW), Washington, D.C.
REPORT NO	Rand-R-2531-HEW
PUB DATE	Apr 80
CONTRACT	300-76-0311; 300-77-0515
NOTE	133p.
EDRS PRICE	MF01 Plus Postage. PC Not Available from EDRS.
DESCRIPTORS	Advisory Committees; *Cooperative Programs; *Coordination; Federal Programs; *Federal State Relationship; Financial Support; Government Role; *Government School Relationship; Program Administration; Program Descriptions; State Agencies; Surveys
IDENTIFIERS	*Elementary Secondary Education Act Title IV

ABSTRACT

Title IV represents the first consolidation of federal education programs. It funds a wide range of items, from school library acquisitions to innovative projects on art education and teenage pregnancy. The major objectives of this study were to describe how the Title IV program operates in states and local school districts; to assess Title IV as an example of a consolidated program strategy; and to use Title IV as a basis for understanding the role of the states in implementing federal education policy. Data sources include a survey of Title IV program officials and state advisory council members in 50 states, surveys of public and nonpublic school officials in about 600 local districts, and fieldwork in eight state departments of education and 24 school districts. The study supports the following general conclusions about Title IV: (1) Title IV is a popular, well-run program that is praised for its flexibility and ease of administration. (2) Title IV did not result in consolidated management of former categorical programs. (3) States and local school districts vary in the substance, management, and quality of Title IV-B and Title IV-C activities. (4) Small IV-B and IV-C grants can induce substantial improvement in local practices. (5) Title IV participation of eligible nonpublic school students is uneven. (Author/JM)

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PROGRAM CONSOLIDATION AND THE STATE ROLE IN ESEA TITLE IV

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Published by The Rand Corporation

PROGRAM CONSOLIDATION AND THE STATE ROLE IN ESEA TITLE IV

PREPARED FOR THE U.S. OFFICE OF EDUCATION, DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

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R-2531-HEW
APRIL 1980

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SANTA MONICA, CA. 90406

PREFACE

Title IV of the Elementary and Secondary Education Act (ESEA) represents the first major consolidation of federal education programs. The program consists of two parts, B and C. Title IV-B includes programs authorized by ESEA Title II (school library resources, textbooks, and other instructional materials); the testing, counseling, and guidance components of ESEA Title III; and Title III of the National Defense Education Act (NDEA) (support for strengthening instruction in academic subjects). Title IV-C comprises those objectives of ESEA Title III related to supplementary centers and innovative projects, ESEA Title V (strengthening the leadership resources of state education agencies and local school districts), and Sections 807 (dropout prevention) and 808 (health and nutrition projects for low-income families) of ESEA. This study of ESEA Title IV, sponsored by the U.S. Office of Education (Contract No. 300-77-0515), had three major objectives:

- To describe how the Title IV program operates in states and school districts;
- To assess Title IV as an example of a consolidated program strategy;
- To use Title IV as a basis for understanding the role of the states in implementing federal education policy.

We hope this study will be useful to federal policymakers in deliberations about future federal consolidation strategies and the federal program role, and to state and local program officials in identifying alternative management strategies for the Title IV program.

SUMMARY

Title IV represents the first consolidation of federal education programs. It consists of two parts, B and C. Title IV-B includes programs originally authorized by ESEA Title II (school library resources, textbooks, and other instructional materials); the testing, counseling, and guidance components of ESEA Title III; and Title III of the National Defense Education Act (NDEA) (support for strengthening instruction in academic subjects). Title IV-C comprises those objectives of ESEA Title III related to supplementary centers and innovative projects; ESEA Title V (strengthening the leadership resources of state education agencies and local school districts); and Sections 807 (dropout prevention) and 808 (health and nutrition projects for low-income families) of ESEA.[1]

Title IV combines a myriad of programmatic purposes and grant strategies. It funds a wide range of items, from school library acquisitions to innovative projects on art education and teenage pregnancy. At the state level, IV-C strengthening monies (formerly the ESEA Title V program) fund state education agency (SEA) activities ranging from computer programming to legal services and staff development. Titles IV-B and IV-C also embody distinct funding strategies: IV-B operates as an entitlement program for local districts, with allocations determined by a state-specified formula, while IV-C functions as a competitive grants program. Because of its range of programmatic purposes and strategies, and because of its discretionary nature, Title IV provides a unique opportunity to examine various federal policy options as well as substantively different state and local program choices.

This study has three major objectives:

- To describe how the Title IV program operates in states and local school districts;
- To assess Title IV as an example of a consolidated program strategy; and
- To use Title IV as a basis for understanding the role of the states in implementing federal education policy.

The data sources include a survey of Title IV program officials and State Advisory Council members in fifty states; surveys of public and nonpublic school officials in about 600 local districts; fieldwork in eight state departments of education and twenty-four school districts; and extant fiscal, administrative, and demographic data obtained from various federal and state sources.

OVERVIEW OF THE TITLE IV PROGRAMS

This study supports the following general conclusions about Title IV:

- *Title IV is a popular, well-run program that is praised for its flexibility and ease of administration.* State and local program staff cite Title IV as a

[1]In fiscal year 1978, the Title IV appropriation was approximately $339.0 million: $154.5 million for Part B and $184.5 million for Part C.

model federal program because of its minimal categorical constraints and procedural red tape. Federal staff receive high marks for their ability and responsiveness in program administration.

- *Title IV did not result in a consolidated management of former categorical programs.* Most states and local districts manage IV-B and IV-C independently, as they did the categorical programs replaced by Title IV. The few that consolidated Title IV management and program activities did so because their preexisting management style favored program integration. For the most part, however, little or no consolidation occurred because neither the Title IV legislation nor the federal program response contained incentives for state officials to make more than pro forma response to the Title IV consolidation.
- *States and local school districts vary in the substance, management, and quality of their IV-B and IV-C activities.* State and local program staff have taken advantage of Title IV's discretion to shape program activities to their particular and often quite different needs and management preferences.

  However, both the strength and weakness of Title IV lie in its flexibility. Title IV's programmatic discretion permits state and local staff to develop activities that respond to their needs much more effectively than a federally developed strategy could. Federal and state directives merely target funds and articulate broad program objectives; state and local staff determine what happens next. State management of IV-B and IV-C depends on the interests of program staff, their expertise, and their assessment of the program strategies most likely to enhance local practices. Similarly, local interests and skill determine the implementation of federal and state Title IV regulations. If local commitment or expertise is lacking, Title IV funds can be underutilized, with IV-B becoming primarily a way to fill gaps in local purchasing and IV-C a target of financial expedience. In this case, IV-B and IV-C funds become a wasted opportunity and do little more than sustain the status quo.
- *Small IV-B and IV-C grants can induce substantial improvement in local practices.* Small Title IV grants can greatly assist in developing district practices and resources because they allow staff to tailor activities to local needs and because they often stimulate local commitment and enthusiasm. The freedom to specify project objectives, identify target groups, and devise project strategies often elicits a level of local creativity and interest that is absent when categorical strings diminish local sense of ownership and constrain choices.
- *Title IV participation of eligible nonpublic school students is uneven.* Nonpublic participation varies greatly between Parts B and C. The majority of eligible nonpublic schools receive IV-B services and find them useful. Only about one-third to one-quarter of IV-C projects include nonpublic students. Thus, federal requirements for equitable nonpublic participation in this program component are presently unmet. There is also a serious question about the quality of involvement for those nonpublic students that do participate in local IV-C activities; their participation is both less extensive and less constant than it is for public school students.

The Title IV-B Program

Because Congress granted local districts complete autonomy in allocating IV-B funds among the program's eligible purposes, the state has less to do with shaping local projects, and most SEA IV-B staff now see their function as that of auditor and program guideline interpreter. Few SEA staff view themselves as inexorably constrained by federal regulations, however. In fact, many SEA IV-B respondents in our sample (46 percent) believe that state-level staff can do more with the program if they so desire. Although it is true for only a minority of states, some SEAs have used state-developed management, planning, and information strategies to persuade local districts to view IV-B as more than an acquisitions service.

Local allocation choices since the IV-B consolidation mirror the purposes of ESEA Title II and NDEA III, former categorical programs. We found that on average only 8 percent of local IV-B funds are used for guidance and counseling activities; 62 percent of the school districts in our sample spend none of their IV-B funds on guidance and counseling.

Three-fourths of the districts in our sample allocate their funds on a per capita basis to individual schools. In these cases, there is little that can be called a IV-B program, and school site personnel use their IV-B allotment to supplement ongoing activities. However, one of the most impressive observations from our fieldwork is that, when time and effort are spent in developing a focused project, a small IV-B grant often yields a high return. Furthermore, many local administrators report that, especially as local budgets tighten, IV-B funds are critical in maintaining the quality of district library/media resources and individualized instruction programs.

IV-C Innovative Projects

States vary greatly in their IV-C funding strategies. Some use a highly competitive grants process to promote selected, exemplary projects, while others award funds to virtually every school district in the state. Most states spend a large proportion of their IV-C funds on development grants to foster new approaches to educational problems. Over the past few years, however, more states have begun to experiment with other funding categories such as mini grants, dissemination projects, and adoption grants. This shift in the mix of IV-C funding strategies is not a direct result of consolidation. Rather, SEA staff report that it occurred because states now have better information about school district needs and how to address them. Also, districts have compiled an array of successful exemplary projects that other districts can adopt.

Besides a shift in funding strategies, states have also begun to focus more on project substance. Under Title III few states attempted to prescribe objectives for local projects. Now, about 30 percent of all SEAs set aside slightly more than one-half of their funds to support projects reflecting state priorities. Again, consolidation was not directly responsible for this change. Rather, states are trying to improve what has been a rather poor record for project continuation once federal funding ends. At the same time, the budgetary constraints now faced by states and districts encourage a more parsimonious and careful expenditure of program

funds. Consequently, both state programs and local projects have generally moved toward an emphasis on central problem areas and, particularly at the state level, an explicit effort to tie IV-C program objectives to identified needs and priorities.

IV-C Strengthening

The activities supported by IV-C strengthening funds have not changed significantly from those funded under the earlier Title V program. Although states allocate a portion of IV-C strengthening funds to all the express purposes of the strengthening component, various aspects of administrative support (including fiscal accountability and data systems) remain the highest priorities for the use of strengthening funds. Such state-level developmental activities as training and dissemination receive a much smaller share.

Given these patterns, it is possible to argue that strengthening funds are supplementing what have come to be seen as routine SEA activities. Still, as states face tighter budgets, it is likely that without strengthening funds these central services would be substantially reduced, if not eliminated.

Nonpublic Participation in Title IV

The Title IV legislation requires equitable program benefits for students attending nonpublic and public schools. However, nonpublic participation in Title IV varies greatly between Parts B and C. Although some problems still exist with IV-B, the majority of eligible nonpublic schools receive services and find them appropriate. Since only about one-third to one-quarter of IV-C projects include nonpublic students, however, federal requirements for equitable participation in this program component are presently unmet. A serious question also arises about the quality of involvement for those nonpublic students that do participate. Reasons for low levels of nonpublic involvement include: SEA failure to monitor the quality of local assurances and to provide technical assistance on nonpublic involvement; the competitive nature of IV-C funding; and the inability and unwillingness of many nonpublic schools to pursue IV-C funding actively.

State Advisory Councils

As part of the Title IV consolidation, existing Title III State Advisory Councils (SACs) were expanded to represent the various categorical interests now consolidated into Title IV. Federal regulations also defined greater SAC responsibilities.

We found that a majority of SACs are active and influential in IV-C activities. They are less active in IV-B, but they participate in IV-B evaluation activities. In most states, the SAC's involvement in IV-C strengthening is extremely limited or nonexistent. Despite this unevenness, Council members and SEA staff agree that SACs have measurably and positively affected Title IV operations.

TITLE IV AND THE ROLE OF THE STATES

This study of Title IV provides only limited information about state-level implementation, and more extensive research comparing Title IV with other federal programs is needed. Clearly, however, states vary substantially in their response to federal programs.

Title IV operations across the country demonstrate a need to think of implementation as a multidimensional concept, that there may be multiple program strategies to achieve a particular policy aim, and that successful implementation can involve programmatic and organizational development as well as compliance by lower levels of government. The legislative and administrative history of the Title IV consolidation reveals how federal choices can strongly influence state behavior. At the state level, the way an SEA is organized and its customary way of dealing with local districts largely determine whether the state acts as a passive funding conduit, concerned only with compliance, or whether it actively shapes federal programs to promote the state priorities. Along with a state's political culture, these factors also critically affect the kind of technical assistance that SEAs provide to local districts.

IMPLICATIONS FOR FUTURE PROGRAM CONSOLIDATIONS

Although the experience with ESEA Title IV is not a good test of the merits or costs of program consolidation, it suggests a number of requisites for a successful consolidation policy. First, it points out the instability of a consolidation built on *political* rather than *substantive* logic. In ESEA Title IV, Congress attempted to consolidate programs that were not substantively or procedurally compatible. Consequently, in the view of many practitioners, Title IV program components are a jumble of 'apples and oranges.' Compatibility, then, is a first condition for success.

A second one is federal program reorganization to reflect consolidated program objectives. The absence of genuine consolidation at the federal level apparently influenced state program choices. The federal organizational response, then, is an important cue to state officials on whether they should take federal objectives seriously or whether they are free to continue their activities essentially as before.

A related lesson is that just as the federal response must represent substantive change, so must a consolidated policy represent more than a shuffling-together of prior categorical legislation. The Title IV legislation contained no new language to suggest Congressional commitment to a consolidated program effort, nor did it include incentives to encourage the institutional changes assumed by consolidation.

Finally, the Title IV experience shows that the effects of a consolidated strategy will differ according to the organizational environment into which it is introduced. It is difficult to mandate or legislate institutional change under almost any circumstances; it almost impossible to do so if the federal level program response demonstrates only pro forma change and federal legislation contains few incentives to persuade state and local managers to alter customary practices.

POLICY MATURATION

Title IV also illustrates how needs and interests change as a federal policy matures. Title IV has reached a stage of maturity that calls for a federal role different from what was appropriate fifteen years ago. We believe the time has come for federal Title IV officials to concentrate less on compliance mechanisms and more on substantive program development, to capitalize on the cumulative learning that has taken place within Title IV. State officials working with local school districts should do the same. Because Title IV depends on people for its success, there is a critical need to establish effective networks of program officials from all three levels of government, who will share their expertise and provide mutual support.

ACKNOWLEDGMENTS

This study was fortunate to have the active involvement and guidance of a particularly talented and thoughtful Project Advisory Group. From the outset, expert assistance and advice were contributed by Project Advisory Group members Norma Botkin (former Chair, National Association of State Advisory Councils), Richard Corian (Assistant Director, Specially Funded Programs Branch, Los Angeles), Gerald Hamrin (Libraries and Learning Resources, California Department of Education), Margaret Mauter (Director, Division of Planning and Evaluation, Ohio Department of Education), Lawrence Moon (Federal Program Director of Minneapolis), John Rice, Jr. (Associate Suprintendent and Director of Government Programs, Archdiocese of New Orleans), John Schaeffer, Title IV-C program (California Department of Education), and Paul Winkler (New Jersey Department of Education). They worked hard to bring relevance to the study design and instrumentation. In addition to the on-going assistance of this group, the study was influenced significantly by the comments and advice of participants in a workshop held prior to design of the study's questionnaires. Workshop participants, representing diverse positions in the Title IV policy system, spent two intensive days generating questions and caveats to guide the study. (Workshop Participants are listed in Appendix B.) The project advisory group members and workshop participants were invaluable in helping us understand the reality of state and local Title IV operations.

Federal Title IV program staff also contributed generously to the study. Milbrey Jones of Title IV-B and David Phillips of IV-C, and their staff, made their files available to us and responded quickly and cheerfully to requests for documentary information. The project received critical support and assistance from our USOE project monitor, the late Penrose Jackson. We felt a deep personal and professional loss at his death shortly before the final report was completed. Ann Bezdek gracefully and efficiently assumed his responsibilities and contributed significantly to the final product.

A multifaceted research project such as this relies on the interdisciplinary skills of many people. We were fortunate in being able to draw on the diverse expertise of a talented group of Rand staff and consultants. Jane Cobb and Abby Robyn, with the assistance of Maureen Carney and Susan Reese, spent many hours on the telephone locating respondents for our field work and arranging interview schedules. An extraordinarily talented group of researchers conducted the field work: Mimi Baer, Maureen Carney, Jane Cobb, Richard Elmore, Eleanor Farrar, Renee Gould, Jerome Murphy, and Richard Williams.

Carl Morris and Dan Relles provided invaluable assistance in designing the study's sampling plan and drawing the survey sample. Gail Bass and Gail Zellman developed the multiple survey instruments. The massive and complex data management responsibilities as well as preparation of various study files were handled with patience and persistence by Millicent Cox, with the assistance of M. C. Brill and Susan Reese. Christopher Myers provided critical technical and analytical assistance with the data analysis.

Rand technical reviewers Phyllis Ellickson and John Pincus, as well as members of our Project Advisory Committee, Rand colleague Paul Hill, federal Title IV staff, Carl Wisler and Ann Bezdek of USOE, offered perceptive and useful comments on the draft manuscript, The report has been substantially improved by their assistance.

Ann Westine handled the job of manuscript preparation with skill and good humor. The editorial talents of Will Harriss, Rand Publications Department, helped turn our rough draft into a finished product.

Finally, we would like to acknowledge the generous contributions of time and insight of the many state officials and public and non-public school personnel who met with us and spent time completing the study's questionnaires.

All of these people made this study possible and substantially improved the result. They are, of course, in no way responsible for its shortcomings.

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Chapter 1

INTRODUCTION

Since the passage of the Elementary and Secondary Education Act (ESEA) in 1965, federal aid to education has been largely categorical, targeted to specific student populations and programmatic purposes. Over the years, however, program consolidation has often been proposed as a strategy for simplifying administration and improving service delivery. Although Congress has been reluctant to compromise the separate identities and purposes of federal categorical programs, it responded to various pressures for program simplification by enacting the ESEA Title IV consolidation in 1974.

Title IV represents the first consolidation of federal education programs. It consists of two parts, B and C. Title IV-B includes programs authorized by ESEA Title II (school library resources, textbooks, and other instructional materials); the testing, counseling, and guidance components of ESEA Title III; and Title III of the National Defense Education Act (NDEA) (support for strengthening instruction in academic subjects). Title IV-C comprises those objectives of ESEA Title III related to supplementary centers and innovative projects, ESEA Title V (strengthening the leadership resources of state education agencies and local school districts), and Sections 807 (dropout prevention) and 808 (health and nutrition projects for low-income families) of ESEA.[1]

The Title IV consolidation combined a myriad of programmatic purposes and grant strategies. The program funds a full range of items from school library acquisitions to innovative projects dealing with topics as diverse as art education and teenage pregnancy. At the state level, IV-C strengthening monies (formerly the ESEA Title V program) support a variety of state education agency (SEA) activities ranging from computer programming to legal services and staff development. Titles IV-B and IV-C also represent very different funding strategies: IV-B operates as an entitlement program for local districts with allocations determined by a state-specified formula, while IV-C functions as a competitive grants program. Consequently, because of its range of programmatic purposes and strategies, Title IV provides a unique opportunity to assess various federal policy options.

STUDY OBJECTIVES

Title IV's diversity and history as a consolidated program means that any evaluation of it must accomplish several different purposes. On the one hand, the standard evaluation tasks of identifying program goals and determining whether current activities reflect these objectives must be performed for all the programs included in Title IV. On the other hand, Title IV also needs to be evaluated as an

[1]In fiscal year 1978, the Title IV appropriation totaled $339,019,324: $154,497,324 for Part B and $184,522,000 for Part C.

example of a consolidated funding strategy and as a federal program that depends heavily on the states for program implementation and service delivery. Consequently, this study has three major objectives:

- To describe how the Title IV program operates in states and local school districts;
- To assess Title IV as an example of a consolidated program strategy; and
- To use Title IV as a basis for understanding the role of the states in implementing federal education policy.

This study concentrates on funds allocation and program management, and only incidentally on the substantive impact of Title IV in states and local school districts. In describing Title IV operations we are particularly concerned with the ways in which states distribute funds to local districts, how they establish program priorities, and how state management strategies affect local practices. We also examine several topics of special concern to Title IV administrators: nonpublic school participation in Title IV, the impact of state advisory councils on program operations, and state technical assistance to local districts.

As our analysis of Title IV's legislative history will indicate, Congressional intent in consolidating the categorical programs now included in Title IV was ambivalent. Therefore, in assessing Title IV as an example of a consolidated program strategy, we need to understand how the clarity of Congressional intent affects the administrative response of federal agencies. Similarly, to understand state and local behavior we need to assess how their actions are influenced by those one level above them in the policy hierarchy. In other words, we are assuming that although each level in the federal system constitutes a set of independent actors, the behavior of each is constrained by the actions of those one level above.

In evaluating Title IV as a consolidated program, we also need to determine how well it meets the theoretical objectives of consolidation. As we examine Title IV operations at all three levels of government, then, we will assess whether it has resulted in simplified administrative procedures, greater program coordination and flexibility, and more delegation of decisionmaking authority to lower levels of government.[2]

Most policy implementation studies have focused on the local level, despite the critical role states play in implementing many federal grant programs. Since the states administer Title IV and are allowed considerable latitude in their management and funding strategies, this program provides a basis for identifying how state political and organizational factors affect federal program implementation. This final study objective allows us to examine how implementation processes vary across states and focuses on the role of administrative agencies, policymaking bodies like the governor's office and state legislature, and state political culture or the larger context within which a policy is implemented.

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[2]The Education Amendments of 1978 (PL 95-561) significantly modified major features of the 1974 Title IV consolidation. The single application for Parts B and C is discontinued; a proposed Part D removes guidance and counseling from IV-B; and IV-C strengthening is deleted from Part C and reinstituted as a separate categorical program.

Although our study was conducted prior to the 1978 Amendments and describes the program as it was established in 1974, we have tried to make the majority of our conclusions equally applicable to the present program framework.

STUDY DESIGN

Our analysis is based on three data sources:

- A survey of program officials and State Advisory Council members in all fifty states, Title IV staff in approximately 600 school districts, and approximately 400 nonpublic school administrators;
- Fieldwork in eight state capitals and three districts in each of these states; and
- Extant fiscal, administrative, and demographic data obtained from various federal and state sources.

At the state level we surveyed five classes of respondents: SEA federal programs managers, SEA Title IV directors, SEA IV-B and IV-C coordinators, and two members of each state's advisory council. Response rates at this level ranged from a high of 98 percent for IV-B coordinators to a low of 74 percent for federal programs managers. Respondents were asked a range of questions about state Title IV operations, including: how program priorities are established; how funds are allocated to local districts; the extent of coordination between Parts B and C; the effect of consolidation on SEA operations; the relationship between the state and local districts; and the SEA's relationship with the U.S. Office of Education (USOE) and other state agencies.

To minimize costs and ensure that we had sufficient local district data within each state for assessing SEA impact, we limited our local school district sample to twenty states. We used a cluster sample of 600 school districts selected in two stages from these twenty states. (Appendix A contains a detailed discussion of our sampling plan and data collection procedures.) Although local districts were initially selected to be representative of those within a given state, all district cases were weighted prior to analysis so the entire sample would also be representative of the more than 16,000 school districts in the country. Sample case weights were based on region, student enrollment, and metropolitan status (see App. A).

There were five classes of local level respondents: federal programs managers, IV-B coordinators, IV-C project directors, and nonpublic school principals and superintendents. Response rates ranged from a high of 79 percent for IV-C project directors to a low of 57 percent for nonpublic school principals. Questions asked of local respondents focused on: their assessment of SEA Title IV activities; how Title IV funds are used locally; the effect of consolidation on local district operations; and nonpublic student participation in Title IV.

To supplement the survey data and expand our understanding of the larger political and organizational context within which the Title IV program operates, we undertook fieldwork in eight states and twenty-four local districts.[3] These eight states are a subsample of the twenty-state sample and were chosen so as to maximize variation on such factors as Title IV program strategies, SEA organizational structure, and degree of state authority over local districts. Selection criteria for local districts included: district size, urban/rural status,

[3]Because we assured complete confidentiality to all respondents, this report does not identify individual states or school districts.

number and type of nonpublic schools within the district, and IV-B and IV-C project characteristics.

Fieldwork respondents included not only Title IV-related staff, but also those concerned with education generally in a state or school district. Consequently, state legislators and their staffs, gubernatorial staff, interest group representatives, and state board of education members were interviewed at the state level. In addition to district administrators, school site staff, and nonpublic school officials, school board members and the education reporter for the local newspaper were interviewed in each school district.

We used open-ended interview guides to ensure comparability across sites, but encouraged interviewers to ask additional questions and pursue any other lines of inquiry they judged useful. At the conclusion of the fieldwork, a case study was prepared for each state visited. Again, a detailed outline was used to maximize data comparability across states.

The record data collected were used primarily to assess the fiscal impacts of Title IV—differences in program allocations across types of school districts and changes in funding patterns since consolidation. These data were obtained from state fiscal records, state Title IV program plans filed with USOE, the Census, and from data collected by USOE on federal program beneficiaries (Section 437 data).

In addressing the study's three major objectives, this report presents an essentially qualitative description of Title IV and its status as a state-administered, consolidated program. Where appropriate, quantitative techniques have been used to determine the effect of various factors on expected Title IV-related outcomes.

ORGANIZATION OF THE REPORT

Chapters 2, 3, and 4 each deal with one of the major study objectives. Chapter 2 presents an overview of Title IV; Chap. 3 assesses Title IV as a consolidated program; and Chap. 4 examines Title IV and the role of states as federal program implementors.[4] The final chapter outlines our study conclusions and recommendations.

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[4]Although each chapter deals with some aspect of the Title IV program, the diversity of our research objectives makes Chaps. 2, 3, and 4 distinct reports that could actually be regarded as separate studies presented in one document.

Chapter 2

OVERVIEW OF THE TITLE IV PROGRAM

State and local officials rank Title IV among the most popular of all federal education programs. Despite the relatively small amount of money an average district receives from Title IV, most state and local officials believe it produces a high marginal return. They credit this to the program's lack of targeting requirements and its support for services that are otherwise usually eliminated from ever-tightening local budgets.

This chapter describes the various components of Title IV and focuses on the role of states and local school districts in allocating funds and administering program activities. Separate sections on IV-B and IV-C detail state-level distribution trends, state program management, allocation of program funds within local districts, and local project activities. Another section describes how IV-C strengthening funds are spent and how they affect SEA operations. Two final sections, on nonpublic school participation in Title IV and state advisory council (SAC) operations, discuss issues that transcend individual Title IV programs. More general concerns such as technical assistance and program evaluation are briefly discussed here and elaborated upon in subsequent chapters.

THE TITLE IV-B PROGRAM

State-Level Distribution of IV-B Funds

Each state is responsible for developing a formula to distribute IV-B funds to its local school districts. Congress specified three formula components: general enrollment, high tax effort, and high-cost children. Although Congress did not specify exact proportions for each component, it did indicate that a "substantial" amount of IV-B funds should be awarded to districts showing high tax effort or educating a large number of high-cost children. Congress thus intended that IV-B should serve a redistributional purpose.

Many state officials, however, believe that the IV-B formula's emphasis on high tax effort and high-cost students is inappropriate. They believe the requisite data collection and bookkeeping unduly burden state staff and, more important, that special attention to high-cost factors encourages unproductive "dollar stacking." In other words, they believe that districts educating high-cost children and demonstrating high tax effort are already receiving substantial extra assistance from other state and federal programs. The addition of more special funds, state officials argue, will have a negligible marginal effect.

The absence of a Congressional definition for "substantial," combined with the belief of many state officials that IV-B funds would be most efficiently and equita-

bly distributed on the basis of general enrollment, has resulted in broad variation in state IV-B formulas. All states utilize general enrollment and high-cost components, but the percentage of total funds allocated by general enrollment ranges from 25 to 80 percent with an average of 67 percent. The proportion of IV-B funds distributed on the basis of high-cost children ranges from 5 to 70 percent, with an average high-cost component of 21 percent. States use from one to seven high-cost factors to determine a local district's allocation, with 30 percent of the states using three or more (see Table 2.1). A number of substantively different high-cost factors are included: sparsity, non-English-speaking, low-income population, and low reading or math achievement. The factors used most frequently are those associated with low income or poverty status (see Table 2.2).

Table 2.1

NUMBER OF HIGH-COST FACTORS IN STATES' USE OF IV-B FORMULA

Number of Factors	Number of States Using This Number (FY 78)
1	16
2	19
3	7
4	3
5	3
6	1
7	1

Table 2.2

FACTORS USED IN HIGH-COST COMPONENT OF IV-B FORMULA

Factor	Number of States Using This Factor		
	FY 76	FY 77	FY 78
Low income/poverty status	48	49	43
Particular subject matter enrollment (Basic Skills, Critical Subjects, Vocational Education)	5	10	10
Bilingual	24	26	26
Smaller isolated schools	29	36	38
Identified special populations (Gifted, handicapped, low achievers)	24	43	48

A total of 43 states use a high-tax-effort component; this component ranges from 3 to 46 percent of the total formula, with 17 percent the average. The states that do not use high tax effort in their formula are primarily those that have attempted to equalize school spending across districts.

Despite this variation in state IV-B formulas, the most significant factor in determining the size of a district's IV-B grant is general enrollment, or average

daily membership. As Table 2.3 shows, there is a nearly perfect correlation between the number of students served by a district and the size of its IV-B grant. District poverty status, a high-cost factor of concern to Congress, has almost no relationship to district grant size. Interestingly enough, the size of a state's high-cost component does not differentially affect local IV-B awards. That is, even though state allocations on the basis of high-cost factors range from 5 to 70 percent, this variation does not significantly affect grant size for local districts with a high poverty index.

Table 2.3

BIVARIATE CORRELATIONS BETWEEN IV-B FUNDING AND DISTRICT CHARACTERISTICS

Variable Number	District Characterisic	Variable Number 1	2	3	4	5	6	7
1	Average Daily Membership	1.00						
2	District Poverty Index[a]	-.00	1.00					
3	IV-B funds per pupil	.02	.21	1.00				
4	Total IV-B funds, FY 76	.99	.02	.03	1.00			
5	Total IV-B funds, FY 77	.99	.02	.05	.99	1.00		
6	Total IV-B funds, FY 78	.99	.02	.05	.99	.99	1.00	
7	High-cost component as proportion of total IV-B formula	.05	.09	.04	.03	.03	.04	1.00

[a]District Poverty Index is the percent of district children below poverty level (1970 Census).

The failure of high-cost components to affect local grant size differentially can be explained by the factors included in a state's high-cost component. Where states have used multiple high-cost factors, these measures are generaly exclusive and address different target populations—for example, sparsity, bilingual, gifted, handicapped, and low-income typically have little practical overlap. As a result, for many states, the high-cost factor simply mirrors general enrollment. In other words, a high-cost component specifying additional funds on the basis of low-income families, non-English-speaking students, small schools, and gifted students will result in a distribution of IV-B funds virtually identical to that determined by general district enrollment. Similarly, states using only one high-cost identifier other than poverty status (e.g., low reading and math achievement) may also substantially duplicate general enrollment. Thus, it is not surprising that, using data from the sample states, we found that the bivariate correlation between funds awarded to a district for high-cost children and total district enrollment ranged between .80 and .96.

In summary, although states have devised quite different IV-B formulas, most have specified formulas whose high-cost component simply mirrors general enrollment. Thus, the differential treatment intended by Congress seems to have resulted only in more state and local paperwork, not in a redistribution of funds based on special needs.

State IV-B Program Management

Besides combining several categorical programs into one, the Title IV consolidation also resulted in some state-level administrative changes. Congressional ad-

vocates of consolidation assumed that a consolidated program would be easier to manage than several categorical ones, and consequently reduced the amount of administrative funds available to SEAs. SEAs have compensated for this decrease by reducing the number of IV-B staff and by eliminating some services to local districts, usually on-site technical assistance.

Consolidation modified the state's IV-B function in substantive ways as well. A number of SEAs had played a major role in developing and implementing library and media activities funded by the previous categorical programs. For example, some SEAs developed exemplary library and media projects that served as models for Title II and NDEA III activities throughout the state. Local staff were then required to use their categorical funds to support such projects.

However, consolidation curtailed the SEA's role in shaping local projects. Congress granted local districts complete autonomy in allocating IV-B funds among the eligible purposes: library and learning materials, audiovisual equipment, guidance and counseling, testing, and minor remodeling. Since federal IV-B regulations specify no state role beyond fiscal oversight, it is not surprising that in most SEAs, IV-B responsibilities are limited to development and implementation of the IV-B formula. Staff in these states see themselves primarily as auditors and interpreters of program guidelines. For example, although 93 percent of the SEAs offer IV-B technical assistance to local districts, in most SEAs this assistance is limited to clarification of state and federal regulations and help (usually by telephone) in preparing applications. Less than half the states provide substantive assistance, such as help in developing innovative ideas. The upshot is that IV-B program staff in most states reported that they see IV-B as "more of an acquisitions service than a focused program."[1]

In some SEAs, however, IV-B staff have attempted in two ways to establish a substantive role within the constraints of the law. First, some SEAs use state-imposed planning and management requirements to try to create focused programs. For example, one state uses a detailed project application and department approval sheet, thereby allowing SEA program staff to comment to local districts about the focus and specificity of their project objectives and about their evaluation and planning strategies. Another SEA requires that "each school district . . . spend all of (its) funds on an identified need" with the hope that "this concentration of funds to solve a particular problem (will) have some impact on the educational process." Another SEA requires local IV-B staff to identify how the IV-B allocation will be incorporated into a broader district plan.

Such requirements reflect state concern that many districts dilute IV-B funds by spreading them as widely as possible. One SEA IV-B director commented in his annual report: "The greatest problem with local discretion is the practice of many districts to 'reallocate' their money on a per pupil basis to every school within the

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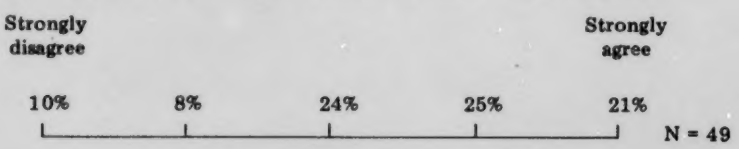
[1]The survey question and frequency of response was:
"Title IV-B really is more of an acquisitions service than a focused program."



community. This results in each school receiving a small sum of money which, for all practical purposes, has no impact on the education within each school."

Other states have suggested just the opposite strategy and have encouraged local districts to allow individual schools to use IV-B funds as they wish. Often this grass roots approach is the result of a state political culture that stresses local control and assumes that the lower the level of government identifying and assessing student needs, the more effectively the problem will be resolved. But, as noted by an SEA IV-B coordinator from one of our fieldwork states that encourages such a strategy, there are distinct trade-offs. While espousing school site allocation decisions, he realizes that few innovative IV-B projects result from such a strategy.

Widely dispersed funds mean that it is difficult to develop or coordinate an innovative project and, consequently, there are few projects that the state can identify as worthy of replication by other districts.

Second, some SEA IV-B staff give substantive direction to local projects by distributing information about quality library and media programs. Approximately 54 percent of SEAs disseminate such information to school districts. For example, one state uses the design developed in an earlier Title II model media project to catalog each district's media holdings, compare them with model plan, and indicate which purchases would be most useful in improving the district's overall media program. This information is displayed on a state-generated computer printout, which district staff can use in allocating their IV-B funds. School district officials find this state activity helpful for judging the strengths and weaknesses of their district's media holdings and in guiding their purchases. Another state approaches the same objective somewhat differently: "The media team initiated under Title II has continued to assist local districts in the development of their library media programs. . . . The media team includes a director funded from state funds and a media specialist and school library consultant funded from Title IV." This team visits school districts throughout the state and provides assistance in assessing a district's program and in identifying needed purchases.

Another state we visited began using its evaluation function to learn about the characteristics of effective projects and the elements of good planning. Each year, the SEA IV-B staff will visit 10 percent of the state's districts and focus on a different program issue—for example, compliance, planning, project implementation, and participant satisfaction. The results of these visits will be published in the state planning guide and the SEA staff hopes that local districts will use this information in targeting their funds and in developing IV-B projects. In this case, then, the state is not recommending substantive priorities to local districts, but rather an allocation and planning process it believes will lead to more effective IV-B projects.

Another management strategy to strengthen the state Part B program involves state-level coordination of IV-B with other state library, media, or guidance activities. In one state, for example, the IV-B staff prepares a planning guide which includes standards that local districts can use in purchasing supplementary materials in any of 24 different curriculum areas. These standards are established cooperatively with the various state-level curriculum bureaus (including art, industrial education, bilingual education, English, mathematics, and physical education) and represent what subject area experts consider to be a good enrichment collection in their respective fields. The state's Bureau of Guidance also receives copies of all

IV-B applications that have a guidance component. The result is a stronger state IV-B program than would have been possible using IV-B resources alone.

Through such management, planning, and information strategies, some SEAs have tried to define both their state program and local IV-B projects as more than "an acquisitions service." Most SEA staff, however, choose a less active and substantive role. Yet it is interesting that few SEA staff see their role as inexorably constrained by the IV-B program guidelines. Most SEA IV-B respondents feel that state level staff can do more with the program if they desire.[2] Cross-tabular analyses show that state-level IV-B staff agreeing with this statement also tend to be those who offer technical assistance that focuses on the development of innovative local IV-B projects. Perhaps more than any other federal program, the character of the state-level IV-B program depends almost entirely on the predisposition and initiative of SEA Part B staff.

Local Allocation Choices

School districts like the IV-B program. Many local respondents commented that Part B should be the "model" for all federal programs because of its flexibility and sensitivity to local control. As one local IV-B coordinator commented, "We are able to purchase what *we* think is important, not what somebody else does." There is also substantial local agreement about the importance of IV-B to the district.[3] Despite the relatively small size of Part B grants, in all types of districts, these funds are seen as making a significant and critical contribution, particularly to the quality of library services.[4]

Tables 2.4 and 2.5 show how school districts allocated their FY 78 funds across eligible IV-B purposes. Both public and nonpublic schools spent most of their funds on printed materials and audiovisual equipment. These choices closely mirror the purposes of the former categorical programs, Title II and NDEA III. Indeed, most state and local staff report that local allocation patterns have not changed significantly as a result of IV-B. These data also indicate that in making a choice between "people or things," local staff generally spend IV-B funds on things.

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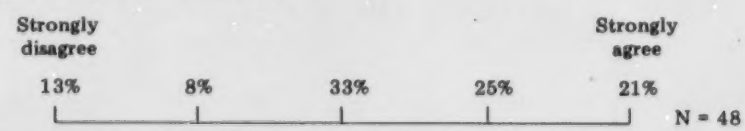
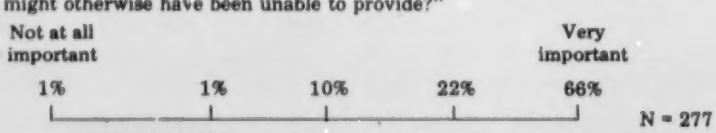
[2]The survey question and frequency of response was:
"Under Title IV, State Education Agencies have ample opportunity to develop a Part B program if they take the initiative."



[3]The survey question and frequency of response was:
"How important have Part B funds been to your district in terms of providing services that you might otherwise have been unable to provide?"



[4]In fiscal year 1978, Title IV-B per pupil allocations to our sample districts ranged from $.09 to $20.77. The average per pupil allocation was $3.28.

Table 2.4

LOCAL-LEVEL IV-B ALLOCATIONS, PUBLIC AND NONPUBLIC SCHOOLS, FY 78

(Respondent: School District Part B Coordinator)

Category	Mean % Allocation	
	Public Schools	Nonpublic Schools
Printed materials	44	47
Audiovisual materials	31	33
Guidance and counseling	8	4
Instructional equipment	24	21
Testing	4	1
Textbooks	3	5
Minor remodeling[a]	<1	0

NOTE: Figures do not add to 100 percent because of rounding error.

[a]Nonpublic schools cannot spend IV-B funds in this category.

Table 2.5

STATE-LEVEL ESTIMATES OF LOCAL-LEVEL IV-B ALLOCATIONS, FY 78

(Respondent: SEA Part B Director)

Category	Mean % Allocation
Printed materials	35
Audiovisual materials	23
Guidance and counseling	9
Instructional equipment	28
Testing	4
Textbooks	4
Minor remodeling[a]	1

NOTE: Figures do not add to 100 percent because of rounding error.

[a]Nonpublic schools cannot spend IV-B funds in this category.

The mean public school allocation (8 percent) shown in Table 2.4 masks the fact that approximately 62 percent of school districts allocate *none* of their IV-B funds to guidance and counseling. The few districts that spend IV-B funds on guidance and counseling generally undertake a well-defined project. Thus the mean allocation is artifically high; the median allocation of less than 1 percent conveys a more accurate picture of IV-B support for guidance and counseling.

Though local allocation patterns have not changed significantly as a result of IV-B, our evidence suggests that the way decisions are made about what is purchased has changed. In many districts, school site staff or library and media special-

ists played a primary role in deciding how to use Title II and NDEA III funds. With the IV-B consolidation, decisions about funds allocation appear to have moved to the central office in many districts. As a result, many school site staff complain that they do not know what has been ordered for their school until the materials arrive. Some state IV-B staff have also expressed this concern. One director commented in the state's annual report that "There was some co ıcern on the part of Part B staff that educators involved in the building level purposes of IV-B were not always made aware of the grant-writing period by their superintendents and administrators. Therefore, they did not have the opportunity to provide input in the needs assessment . . . process."

We observed this centraliz..g trend during the course of our fieldwork. In fact, central administrators in 15 of the 24 districts in our fieldwork sample make IV-B allocation decisions with little or no participation from school site staff. In the fieldwork sample, such centralized decisions were also correlated with the targeting of IV-B funds for specific purposes (e.g., guidance and counseling, supplementary social studies materials) rather than with allocation to individual schools on a per capita basis. Hence, consolidation has meant that in some districts school site staff and library and media specialists play less of a role in the IV-B process than they did previously. But on the other hand, in our fieldwork districts, centralized decisionmaking allows administrators to concentrate on a specific district need (e.g., improvement of the science curriculum or career education) rather than disperse funds so widely that their effect may be negligible.

However, simply dividing IV-B funds equally among district schools ensures that everyone gets something and does away with the need for time-consuming planning. Despite the behavior of the fieldwork districts, our survey data indicate that a per capita allocation to each school is a common IV-B strategy. Three quarters of the local IV-B directors report that IV-B funds go to all public school students. Furthermore, IV-B directors spend an average of only 13 percent of their time on Part B activities, with much of that time spent on fiscal management and purchasing. The median time spent planning and preparing the IV-B application is three days. In most districts, the relatively small size of the IV-B grant (around $3.00 per pupil on average) means that program administration is a secondary responsibility (or as one respondent put it, "an added responsibility that takes away from regular duties") and more extensive planning for project activities does not appear practical. Many local staff feel that "with the small amount of funds available it is not economical to waste time for innovative uses."

Local staff report that IV-B allocation decisions are also significantly influenced by the fact that "Title IV is the only program flexible enough to enable us to service certain groups." Particularly in districts that receive funds from federal programs aimed at special student groups (such as Title I, Title I Migrant, and Title VII), administrators feel that IV-B funds can be used most effectively in schools without heavy concentrations of students benefiting from other categorical programs. In general, districts that receive significant funding from these federal categorical programs also have many students with similar needs, such as low achievement, but who do not qualify for special funding. Consequently, IV-B funds can provide materials and equipment to these students not participating in other special programs.

The influence of SEA formulas and guidelines varies considerably across dis-

tricts. In most districts, the state formula has little influence on local allocation choices. That is, local IV-B funds are not allocated with attention to state formula categories. One reason is that most local staff are not aware of their state IV-B formula. For example, only 66 percent of local Part B coordinators reported that they "routinely" receive notification of the state formula that determined their grant; over half (57 percent) said that they were not familiar with the formula components. We found only one instance in our fieldwork where SEA IV-B staff closely monitored local adherence to formula allocation guidelines. In part, lack of attention to the IV-B formula reflects state attitudes: IV-B funds should be allocated on as close to a per pupil basis as possible and spent at district discretion. Local feelings about IV-B allocations also foster disregard of formula parameters. Only 27 percent of district IV-B directors report that funds received because of high-cost students are "completely" targeted to those students. Local IV-B directors report that it is too costly for the district to track the funds in this way, given the small amount of funds involved, and that IV-B services are needed by children who do not receive funds under other state or federal programs. As one IV-B coordinator put it, "Let Title I take care of the high-cost kids." However, where local officials do use formula guidelines in allocating funds, the guidelines are often seen as compromising overall program effectiveness. One IV-B director commented that "we get so bogged down in tracking target groups and so on that we really don't have enough IV-B funds to make a difference." Another IV-B director felt that targeting did not make sense for Part B purposes: "The target groups concept is too confining when it comes to working with library resources."

Variations in the influence of SEA guidelines also reflect the state role as defined by SEA staff. State staff who limit their role to the distribution and monitoring of IV-B funds have little influence on fund allocations and on the coordination of IV-B with other district programs. On the other hand, SEA staff who view their role more broadly reportedly do influence local district use of program funds, despite the limited formal authority accorded the states by federal IV-B regulations.

Federal maintenance-of-effort regulations apparently have even less influence on local allocation choices than do state guidelines. Federal regulations require that states show maintenance of fiscal effort across IV-B eligible purposes; states reporting an overall drop in expenditures risk federal withdrawal of their IV-B funds. Few states or local personnel quarrel with the intent of the regulation: to ensure that Part B supplements, not supplants, local funds. However, few state personnel take the requirement seriously, arguing that the accounting costs of a genuine effort would be prohibitive and that the present provision could not accomplish its purpose in any event. Budgets can be too easily manipulated to show what is necessary. As a result, compliance with federal maintenance-of-effort requirements has become a numbers game at both the state and local levels. Not surprisingly, few districts report problems in meeting maintenance-of-effort requirements.[5] In fact,

[5]A few local respondents in states where maintenance requirements are taken seriously did report serious problems. Student enrollment decline or "taxpayer revolt" in a number of districts resulted in an absolute reduction of the district budget. These districts, consequently, were unable to maintain their previous year's effort across IV-B eligible purposes. Other local IV-B staff complained that federal maintenance-of-effort requirements constrain their IV-B allocation choices, prohibiting them, for example, from allocating funds to guidance if no local funds had been spent for that purpose in the previous year.

most local IV-B officials visited in our fieldwork were unaware of the need for special local accounting to show maintenance of effort.

Although Part B was generally accorded high marks for ease of administration, a number of respondents cited two problems. First, many IV-B directors noted that the timing of the IV-B grant award cycle is out of phase with district operations. Materials arrive after the school year begins and applications need to be developed in early spring, before next year's needs are clear. Smaller districts, in particular those accustomed to making cooperative purchases through county offices, felt the grant cycle puts them at a particular disadvantage.

A second problem concerns the rigidity and complexity of state project-amendment requirements. When school districts substitute equipment or library items for those specified on the original application, they must file project-amendment forms with the state. Local project coordinators point out that such requirements often discourage the use of IV-B funds where they are most needed. They also absorb an inordinate amount of administrative time and often prevent the local district from taking advantage of price and model changes.

Local Project Activities

The wide variation in local IV-B allocation strategies—ranging from a straightforward per pupil distribution of funds to a focused project—supports tremendous diversity in local IV-B activities. Where local officials essentially "reallocate" IV-B funds, there is little that can be called a program. School site personnel generally use their IV-B allotment to supplement ongoing activities. However, one of the most impressive observations from our fieldwork is that when time and effort are spent in developing a focused project, there is often a high marginal return on a relatively small IV-B grant. Several examples from our fieldwork illustrate how productive IV-B funds can be with specific targeting and careful planning.

One small, semirural district we visited is using all its IV-B funds for four supplementary high school science courses, a IV-B project now in its second year. The funds are used to pay for course materials, particularly laboratory equipment. The first course focuses on aviation and is team-taught by the physics, chemistry, and earth science teachers. It prepares students for the written portion of the pilot's examination. It was instituted because the chairman of the science department realized that the completion of a nearby air cargo terminal would open up a number of job opportunities. The second course is a research methods course for seniors who wish to go beyond the regular curriculum. The third is a series of internships in industry, and the fourth deals with solar energy. As a result of these courses, enrollment in science courses has increased nine percent and the high school principal reports that several students who previously had attendance problems are now enrolled in these courses and regularly attend school.

Another district we visited has adopted a five-year planning strategy for the use of IV-B funds. Principals and coordinators outline the kind of program they would like to have at the end of five years, and the federal programs director attempts to buy a part of that program each year with IV-B funds. Her philosophy,

now accepted by the district, is that "IV-B funds are not manure that can be spread around so everything will grow."

The district has used its IV-B funds for equipment and materials to convert a number of school libraries into media centers and, over the last few years, for the development of supplementary social studies materials to be used in the primary grades. The only digression from this long-term planning strategy was the use of IV-B funds for a computer project to access curriculum materials being developed as part of the district's IV-C project.

A third district has used most of its IV-B funds over the past two years for junior high school guidance materials. The junior high principal was in the process of revamping his guidance department and recruiting new staff. The district administration, aware of his efforts, allowed him to use the district's IV-B funds for this purpose. The head guidance counselor and the principal decided to spend the IV-B funds on materials that would allow the guidance department to expand its academic focus to include career information and increased student self-awareness as part of its services. According to the principal and head guidance counselor, student demand for guidance services has increased greatly, and for the first time, guidance counselors are working directly with classroom teachers in providing career information. While IV-B is by no means wholly responsible for these changes, district staff credit the program with providing the materials that allowed the junior high to deliver more effective guidance services.

Although these three districts differ in their use of IV-B funds, they have several factors in common. In all three districts, the central administration is committed to targeting IV-B funds, rather than to dispersing them widely. All three also have committed and innovative staff who are willing to make IV-B more than an acquisitions service; at both the district and school levels, they are encouraged to suggest project ideas that meet a district need, and they receive support from central administrators in implementing projects. Our fieldwork indicates that such factors are critical in producing a high marginal return from IV-B funds.

In summary, Title IV-B is a popular program, praised for its ease of administration at both state and local levels. Because people usually take precedence over materials when local budgets are cut, IV-B funds are seen as increasingly important to the maintenance of district library services, individualized instructional programs, and media centers. Part B funds appear particularly critical in small, low-tax-base districts that would otherwise probably have few if any library services or supplementary instructional materials.

A consistent local recommendation for change in the IV-B program was "more money." A number of local administrators asked, "What can be accomplished with such a small amount of funds?" Our fieldwork, as well as open-ended responses to the survey, suggest that a great deal can be done with little money, given local initiative and effort. Systematic application of IV-B funds has brought libraries up to standard and built quality media centers. Small IV-B grants have permitted districts to provide materials to continue individualized programs or support the ideas of a creative teacher. However, even where IV-B is treated as an "acquisitions service," both our fieldwork and our survey data make it clear that IV-B is generally purchasing materials or services that district staff believe are important and that, in a time of budgetary retrenchment, probably could not be provided with local resources.

IV-C INNOVATIVE PROJECTS

Title IV-C regulations allow states considerable discretion in formulating program priorities and funding strategies. SEAs have responded by developing substantively different IV-C programs. For example, one state funds only seven local IV-C projects in order to promote selected, exemplary projects. Another state with approximately the same number of districts, but with an interest in distributing IV-C funds as widely as possible, awarded 265 IV-C grants in FY 1977-78. Still another state awarded IV-C grants to all of its school districts. Table 2.6 shows the percent of school districts in each state receiving IV-C funds.

Table 2.6

PERCENT OF LOCAL DISTRICTS RECEIVING TITLE IV-C FUNDS BY STATE

State	Percent of School Districts Receiving IV-C Funds[a]	State	Percent of School Districts Receiving IV-C Funds
Alabama	26	Montana	3
Alaska	28	Nebraska	5
Arizona	6	Nevada	94
Arkansas	12	New Hampshire	28
California	14	New Jersey	2
Colorado	11	New Mexico	26
Connecticut	30	New York	21
Delaware	50	North Carolina	54
Florida	22	North Dakota	10
Georgia	44	Ohio	60
Hawaii	100[b]	Oklahoma	9
Idaho	15	Oregon	5
Illinois	5	Pennsylvania	18
Indiana	13	Rhode Island	45
Iowa	8	South Carolina	37
Kansas	4	South Dakota	10
Kentucky	97	Tennessee	32
Louisiana	42	Texas	7
Maine	21	Utah	100
Maryland	58	Vermont	18
Massachusetts	16	Virginia	36
Michigan	10	Washington	23
Minnesota	9	West Virginia	84
Mississippi	35	Wisconsin	14
Missouri	6	Wyoming	33

[a]On average across all states, 30 percent of districts receive Title IV-C funds.

[b]Hawaii has only one school district which includes the entire state, hence the 100 percent figure.

Some of this variation reflects demographic differences, but, more important, SEA decisions about IV-C allocations indicate differences in funding philosophy. SEAs vary markedly in their views about how the interests of local districts can best be served, the role of SEA staff, and the function of IV-C funds. These different points of view are seen in the "mix" of grant strategies selected by a particular SEA and in the level of SEA involvement in programmatic concerns, such as establishment of state priorities, provision of technical assistance, and monitoring activities.

State IV-C Funding Strategies

SEA IV-C grants to local districts fall into five broad categories that differ sharply in project objectives, length of funding, and assumptions about the most effective way to meet state and local needs.

Mini Grants. These small grants, usually less than $10,000, are awarded to individual schools or teachers for only one year. They have supported such diverse activities as staff development, ecology field trips, community relations seminars, and reading readiness projects. SEA officials point to three advantages of this funding strategy. First, mini grants provide a way to distribute IV-C funds to a larger number of local school districts. Consequently, mini grants are able to modify the "elitist" reputation earned by Title III in some states, and also provide funds to school districts unable to participate in a stiffer grant competition. Second, many SEA IV-C officials believe that mini grants, in the hands of highly motivated school personnel, can produce a large return for a small investment. Mini grants can purchase the materials or the training necessary to install new project ideas in a school or classroom. Third, mini grants have the advantage of administrative simplicity. Because most states require only brief applications for mini grants, SEA staff do not have to spend an inordinate amount of time on reviewing mini grant proposals or evaluating local mini grant activities. As SEA budgets become tighter, ease of administration has become an important consideration in a number of states.

Adoption Grants. Adoption grants are typically one-year grants of less than $10,000. They are awarded to districts proposing to adopt an "exemplary" or "validated" project, selected from a state catalog of state-validated programs or from exemplary programs included in the National Diffusion Network.[4] Local applications are usually required to show an identified need for the project and to assure that project methods will be continued once the adoption grant terminates. As a funding strategy, adoption grants reflect the expectation that it is unnecessary to "reinvent the wheel"—that is, with assistance in training and other capital costs, local districts can profit from the successful experience of costly program development efforts undertaken elsewhere.

Development Grants. Development grants are usually awarded for a three-year period, although some are longer. Most development projects are funded at $25,000 to $50,000 a year and support local efforts to develop new approaches to specific educational problems. It is hoped that successful projects will not only be incorporated into local practices, but will also serve as a model for other districts confronting similar problems. In three-fourths of the states, statewide priorities are established to guide local proposals for development grants. Only four states require that local proposals address these state-established objectives, while the rest simply indicate state preferences, but do not limit the grants competition to these priorities. The former funding strategy is often the result of a state needs-assessment and is seen as a way for IV-C funds to enhance statewide educational resources.

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[4]The National Diffusion Network (NDN) is a federally sponsored effort to disseminate exemplary projects developed by Titles III and IV-C. Once projects have been validated as successful by the USOE Joint Dissemination and Review Panel, they are included in the "catalog" that NDN-funded state facilitators use to promote local adoptions. In a number of states, IV-C adoption grants are used to fund NDN-offered exemplary projects.

Dissemination Grants. Many SEAs also award funds to support the dissemination of exemplary or validated projects. Project personnel are funded to provide information and technical assistance to potential adopters. Dissemination grants may fund demonstration classroom materials, staff time, travel costs, and informational materials. This strategy is seen as a way to capitalize on prior investment in local development efforts. Most dissemination grants provide $50,000 to $100,000 a year.

Supplementary Centers. IV-C grants are also awarded to supplementary centers or intermediate units that serve as the agent for nearby districts, or a consortia of districts, in the development or adoption of innovative projects. Supplementary centers also receive IV-C funds to provide technical assistance to school districts for such purposes as proposal development, needs assessment, bilingual education, and guidance and counseling. The average single award to supplementary centers is $25,000 to $50,000 a year.

As Tables 2.7 and 2.8 show, developmental grants are awarded by most SEAs and presently consume a majority of IV-C monies. For some SEAs, these figures reflect state-level perception of local interests and needs. As one IV-C director commented, "The demand is generally greater in this area—districts want to try their own ideas." Other SEAs that presently allocate more than 40 percent of their funds to developmental projects view the funds as a longer-term investment in improving educational practices statewide. Finally, some SEA Title IV-C directors justify a significant expenditure for development projects on the grounds that few exemplary or validated practices exist in the areas of greatest need. Programs for rural schools, secondary schools, and staff development were mentioned as areas where development is needed.

Table 2.7

SEA GRANT STRATEGIES

(Respondent: SEA Title IV Director)

Grant Category	% SEAs with Grant Category	Average % of Total Allotment Spent on Category[a]	Range
Mini grants	46	10	1-35
Adoption	88	14	2-50
Development	98	68	2-100
Dissemination	61	12	1-42
Supplementary	44	23	1-92

[a]States that do not grant awards in a specific category were excluded in computing the average percent. Hence, this column adds to more than 100 percent.

However, it is important to note that, in open-ended responses to questions about IV-C funding strategies, at least six of our state respondents reported that their current emphasis on development would change within the next year. They indicated that once commitments to existing development projects were met, more IV-C funds would be shifted to adoption grants.

Table 2.8

TYPES AND SIZES OF IV-C GRANTS TO LOCAL SCHOOL DISTRICTS

(Respondent: District IV-C Project Director)

	Grant Size ($) and Percent by Project Type					
Grant Type	< $10,000	$10,000-25,000	$25,000-50,000	$50,000-100,000	> $100,000	Total
Mini grant	8%	0%	0%	1%	0%	9%
Adoption	14	7	4	2	1	27
Development	3	9	26	9	1	48
Dissemination	1	1	3	4	2	11
Supplementary center	1	1	2	1	0	5
Total	27%	18%	35%	17%	3%	100%

NOTE: Weighted N = 8775.

Over half of responding Title IV-C directors indicated that their states reserved IV-C funds for project continuation. On the average, 50 percent of IV-C funds were reserved for this purpose.

For SEAs, this shift in state funding strategies represents a long-term payoff from earlier Title III and IV-C developmental projects. In the view of many state Title IV-C directors, a sufficient number of exemplary practices have been developed and are operating smoothly enough to justify adoption as a new priority. Or, as a Title IV staff member from the oil country said, "It's time to stop drilling and start pumping."

From one perspective, this shift in IV-C funding strategies can be seen as an important example of state learning and the maturation of a federal education policy. Over half of our respondents indicated that their present IV-C funding strategies were *different* from those under Title III, and that these changes *were not a result of Title IV-C.* Instead, SEA IV-C staff said that changes resulted from better information about school district needs and how to address them, from more state-level expertise in providing assistance to school districts wanting to adopt new practices, and from the development of a range of exemplary projects able to provide working models and technical assistance.

One state we visited typifies this new approach. Traditionally, it used about 65 percent of its IV-C funds for development grants; this figure has now fallen below 50 percent. Besides shifting its emphasis from development to dissemination and adoption, the state has also changed the way it funds various types of IV-C projects. Dissemination projects are funded at higher levels than development projects. The rationale is that in the development phase, IV-C funding should cover only additional costs. For example, the state believes that IV-C should pay for extras such as workshops, substitute teachers, and inservice training, but it should not cover more than a small part of the project director's salary. Once a project is validated, however, it receives a larger grant. The SEA provides this additional funding because the state cannot expect local districts to support personnel who are now, in effect, working in other districts.

This state modified its IV-C funding strategy because of a poor track record

under Title III, when few successful projects were continued. The state is now hoping to improve this situation by placing more emphasis on dissemination and adoption. Its past experience also explains why IV-C grants are now smaller and permit fewer extra personnel to be hired.

This shift from development to dissemination/adoption also underlies the effective partnership we observed in many states between IV-C and the National Diffusion Network (NDN).[7] Indeed, a number of state and local IV-C staff saw the services of the NDN state facilitator as a critical element in IV-C program effectiveness.[8] State facilitators were able to explain local needs or problems, suggest relevant projects, assist in preparing a IV-C adoption proposal, and provide implementation assistance. The role of the state facilitator in analyzing district needs and recommending appropriate projects was enhanced by an ability to advocate local needs, openly discuss problems, and provide timely, on-site assistance. This important role is one that even the best-intentioned or best-staffed SEA can rarely fulfill because of its concomitant monitoring responsibilities, geographic distance, and staff workload.

The data also indicate that SEAs use a mix of Title IV-C funding strategies to respond differentially to district financial and socioeconomic status. Table 2.9 shows that districts reporting a relatively poor financial situation[9] are also more likely to have a higher than average incidence of children living below poverty. Districts with narrow financial margins and responsibility for a higher than average number of poor children generally are less able to muster the time, funds, or staff to propose and implement a IV-C development or dissemination project. As a result, these districts were less likely to participate in former Title III developmental efforts, thereby fostering Title III's reputation as a program for wealthy, suburban districts. The IV-C adoption grant provides a vehicle for low-wealth districts to experiment with new project methods and materials with little cost or risk to the district. Table 2.9 suggests that state-level IV-C staff have been sensitive to these district differences in awarding IV-C grants and, concomitantly, that low-wealth districts have taken advantage of the opportunity afforded by previously developed, exemplary practices.

In summary, the evolving mix of state IV-C funding strategies testifies to the program's flexibility in permitting SEAs to make modifications in light of new information, specific district need, accumulated experience, and past investment.

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[7]The National Diffusion Network is a nationwide system established by USOE to assist school districts in improving their education programs through the adoption of already developed, evaluated, exemplary education projects. Projects approved for dissemination by the NDN must be approved by USOE's Joint Dissemination and Review Panel of evaluation experts.

[8]State facilitators are located within each state and funded by USOE to help local school districts learn about and adopt projects disseminated through the NDN.

[9]The survey question and the frequency of response was:

"How do you view the present financial situation in your district?"

Abysmal	02%
Poor	12%
Fair	31%
Good considering recent trends	41%
Good	14%

Table 2.9

BIVARIATE CORRELATIONS OF IV-C GRANT TYPE AND DISTRICT CHARACTERISTICS

Variable Number	District Characteristic	Variable Number 1	2	3	4	5	6	7	8	9	10	11
1	District Poverty Index[a]	1.00										
2	Average Daily Membership	-.12	1.00									
3	Metropolitan status[b]	.42	-.30	1.00								
4	District financial status	-.41	.09	-.17	1.00							
4	Percent district revenues from federal sources	.42	.01	.12	-.32	1.00						
5	District innovativeness	-.10	.04	-.12	.11	.04	1.00					
6	IV-C grant size	-.09	.12	-.24	.14	.07	.05	1.00				
7	Mini grant	.00	-.04	.07	-.03	-.05	.01	-.31	1.00			
8	Adoption grant	.20	-.00	.17	-.12	.13	-.17	-.36	-.16	1.00		
9	Development grant	-.16	-.03	-.09	.03	-.04	.09	.18	-.33	-.56	1.00	
10	Dissemination grant	-.13	.05	-.08	.13	-.08	.13	.47	-.11	-.19	-.39	1.00
11												

[a]Based on the percent of district children below poverty level (1970 Census).

[b]1 = inside city limits; 2 = SMSA—outside city limits; 3 = not SMSA, or other.

State IV-C Program Management

We asked SEA IV-C directors to specify, in general terms, the major project activities supported by IV-C. Their responses, displayed in Table 2.10, show a strong focus on curricular reform and a lack of emphasis on the former categorical objectives of the programs consolidated by Title IV.

Table 2.10

FY 78 PROJECT MAIN FOCUS

(Excluding Mini Grants)

Project Activity	Average % Total Funded Projects
Staff Development	14
New or Revised Curriculum	43
General Enrichment	14
Special Education	13
Counseling and Guidance	6

Respondent: SEA IV-C Director.
N = 41.

Although relatively fewer projects are focusing on health and nutrition and dropout prevention since consolidation, the number of states with such projects has increased significantly under Title IV-C. Table 2.11 indicates that the total funds spent nationwide for dropout prevention have also increased, while funds for health and nutrition projects have decreased.

These broad project categories reflect the priorities of three-fourths of the states and differ from those under Title III. However, like the shifts in funding

Table 2.11

ALLOCATION PATTERNS: DROPOUT PREVENTION, HEALTH AND NUTRITION

Program and Year	States		Dollars	
	Number	Percent	Amount ($)	Mean
Dropout Prevention				
Section 807				
1976	9	18	2,000,000	222,222
Title IV-C				
1977	24	48	2,380,553	99,190
1978	27	54	2,767,647	102,505
Health and Nutrition				
Section 808				
1971	9	18	2,036,000	226,222
1972	12	24	1,802,950	150,245
1973	12	24	2,084,550	173,712
1974	9	18	1,773,500	197,056
1975	8	16	1,411,500	176,438
1976	6	12	925,000	154,167
Title IV-C				
1977	17	34	1,190,019	70,001
1978	20	40	1,133,405	56,670

strategies, these changes generally do *not* result from the Title IV-C program.[10] Rather, they stem from accumulated experience with innovative projects and changes in the political and economic climate of states and local districts.

In the early days of Title III, there were few state attempts to prescribe substantive objectives for the Title III program or for local projects. Furthermore, in the 1960s and early 1970s, few state boards of education or other state-level agencies established educational priorities. Instead, SEA staff emphasized support for locally developed solutions to locally identified problems. Many SEA staff learned, as a result of this strategy, that such local efforts were often too particularistic to be of general use throughout the state and even too particularistic to respond to central district concerns. Therefore, often neither the project district nor other districts were willing to assume project costs once special funding ended.[11] At the same time, both SEAs and school districts began to face fiscal constraints that, in contrast with the preceding years of growth and expansion, encouraged more parsimonious behavior. Consequently, both state programs and local projects have generally moved toward an emphasis on central problem areas and, particularly at the state level, an explicit effort to tie IV-C program objectives to identified needs and priorities.

Approximately 30 percent of SEAs set aside funds to support projects reflecting state priorities, with the average set-aside around 60 percent. However, as noted

[10]Only 4 percent of our SEA-level respondents (in states that establish priorities) indicated that their priorities changed as a result of the Title IV mandate to increase the participation of small, rural, and low-wealth districts.

[11]See Paul Berman and Milbrey McLaughlin, *Federal Programs Supporting Educational Change*, Vols. 2 and 7, The Rand Corporation, R-1589/2 and R-1589/7, 1975 and 1978.

above, only four states presently earmark 100 percent of their IV-C funds for this purpose. IV-C state-level priorities are typically established jointly by the Title IV staff, the State Advisory Council, and the Chief State School Officer. Unlike more politically visible programs such as Title I and PL 94-142, neither the state legislature, the governor's office, nor special interest groups play a discernible role in specifying IV-C priorities. Because of IV-C's low visibility, the increased discretion afforded SEAs through consolidation has generally not been usurped by broader state interests.

Across the states, IV-C program priorities are primarily influenced by three considerations: the state's general education priorities, the federal mandate to involve small school districts, and concern for local discretion. Of significantly less importance in establishing IV-C priorities are concern for geographic equity or federal priorities as defined in the previous categorical legislation.

The majority of state-level respondents reported that IV-C priorities are very similar to general state priorities, which typically are established by the state board of education and often reflect a statewide needs-assessment. This high degree of correspondence between IV-C program priorities and those identified by the state suggests that many states use the discretionary nature of the IV-C program to shape a broader state leadership role.

States vary in the extent to which they use IV-C to further their own priorities. However, one state in our fieldwork sample suggests how even nominally weak SEAs can use the IV-C program to exert leverage over local districts. Although the notion of local control is very strong in that state and the SEA usually employs a low-key, nonregulatory approach in dealing with local districts, it is one of the few states that require all IV-C project applications to reflect state priorities in order to be considered for funding.

This state's current IV-C priorities include:

- Basic skills
- Strengthening guidance systems
- Dropout prevention
- Projects to improve school nutrition and health services
- Handicapped (particularly secondary-level) child identification projects and such supplementary programs for the handicapped as art education and guidance services)

In selecting these priorities, SEA staff attempted to incorporate state board priorities (basic skills and handicapped education) and federal program concerns (dropout prevention and school nutrition). As a result of this strategy, IV-C now funds several child-identification projects that are coordinated with state and federal handicapped programs, and over 25 percent of the state's IV-C projects deal with health education and dropout prevention. At the same time, local respondents do not feel unduly constrained by the state's funding strategy. They reported that these priorities reflect local concerns and are broad enough to permit local diversity. While it may be difficult to promote state priorities without compromising local flexibility, the experience of those few states that have attempted it has been largely positive.

A second consideration, attention to the involvement of small school districts, appears to have come about independently, though perhaps concurrently, with

IV-C regulations. Over half of our SEA respondents report that the type of district receiving IV-C funds has changed since Title IV began; SEA officials report that more rural and small districts are applying for and receiving IV-C grants. In fact, correlational analysis of our survey data indicates that district enrollment and metropolitan status no longer predict the receipt of IV-C grants the way they did under Title III.[12]

The preponderance of Title III projects in large, urban districts concerned many SEA staff and prompted the development of strategies explicitly designed to increase the involvement of smaller school districts. For example, one state's annual program plan states: "The method of [IV-C funds] distribution is designed to eliminate competition between large and small schools. Funds [are] distributed on a competitive basis within four groups of school districts—50 percent to large, 32 percent to medium, 13 percent to small, and 5 percent to the smallest." SEAs also see mini grants, adoption grants, and supplementary centers as ways to reach school districts traditionally not participating in the competitive grants process. Fieldwork and survey respondents from small or rural districts in many states noted this shift from an emphasis on development and were consistently enthusiastic about the value of mini grants or adoption grants for their district. A survey respondent from a small, low-wealth district summed up the feeling of colleagues from similar districts:

> [The policy] of allowing districts to adopt a previously validated project in such a simple project application is extremely helpful. This is about the only way our district can participate in Part C type activities because competitive grants require more research, staff, and resources than we have to compete on an equal basis . . . with larger districts.

Other local staff pointed out that in small, and especially rural, districts a mini grant of even a few hundred dollars is "a shot in the arm" for district teachers. These small grants, report district officials, go a long way to provide materials for teachers to try new ideas and enhance the staff motivation and sense of professionalism. Particularly in rural areas, mini grants have greatly reduced the professional isolation that erodes teaching skills and stunts incentives for growth.

Although supplementary centers, in theory, could serve a similar function, this "outreach" strategy received mixed reviews. About half of our fieldwork and survey respondents who received services from supplementary centers cited service problems. Two difficulties were mentioned most frequently: First, staff from small, rural districts felt that supplementary centers had an "urban" or "one best system" approach that was inappropriate to their needs; second, many staff from small school districts complained that the supplementary centers were "creaming off" funds that could be used more productively by local districts. Further, a number of administrators from small districts felt that the supplementary centers were serving neither their mandated technical assistance functions nor the interests of small school districts. For example, one said:

> Our SEA is relying very heavily on the [supplementary center] to implement the SEA aspects of IV-C. But because the [supplementary centers]

[12]The bivariate correlations between receipt of a IV-C grant and average daily membership and metropolitan status are −.40 and .05, respectively.

compete with local districts for funding, they are not carrying out the SEA's function nor are they developing projects that necessarily meet our needs. They are doing what they want to do.

The third factor influencing state IV-C program priorities is concern for local discretion. This is seen primarily in the specificity that SEAs attach to state priorities. Even in states earmarking 100 percent of IV-C funds for projects addressing state priorities, these program priorities are stated in sufficiently general terms to allow local staff to propose their own strategies for meeting these objectives. Many SEA staff also see mini grants and adoption grants as a way to support local discretion.

Local Project Activities

Local IV-C project objectives reflect a number of factors: the mandated 15 percent set aside for the handicapped, state priorities, particular local needs, and a perception of IV-C as the only remaining source of discretionary funds. Compared with early Title III projects, the IV-C projects in our sample show a greater emphasis on efforts addressed to central district concerns such as the core curriculum and staff expertise, and less attention to projects sometimes dubbed as "frills."[13]

In order to add detail to the information about local project activities obtained at the state level, we asked local IV-C project directors to indicate the overall focus and particular components of their project. First, we asked whether their project was aimed at schools generally or a specific curricular area. One-fourth replied that their project had a general focus. Activities such as small school projects, parent involvement efforts, management development activities for principals, and competency-based teacher certification are examples of such general projects. The 75 percent of project directors whose projects addressed specific curricular areas were asked to indicate those areas. Table 2.12 shows the frequency with which specific curricular areas were mentioned.

In addition to its substantive focus, a IV-C project also assumes a strategy for addressing project objectives. For example, a project that focuses on elementary reading may replace existing practices with new methods, design a new supplementary activity, adopt new materials, and so on. Consequently, we asked local project directors to indicate the major components of their project's implementation strategy. Table 2.13 displays the response frequency for this question.

Taken together, Tables 2.12 and 2.13 show a strong local emphasis on basic skills and curricular reform. However, these frequencies do not provide a picture of how these project components relate in practice. An important lesson from Rand's study of federally supported innovative projects was that simple project descriptions cannot accurately convey project goals and activities.[14] Likewise, respondents in this study almost always mentioned two or more goals and techniques in combination. Unidimensional project descriptions often mask important secondary objectives and do not offer information about a project's

[13]See Berman and McLaughlin. Local administrators classify projects in areas such as zoo education, cultural awareness, and music education as "frills." This classification is not intended to demean efforts in these areas. Rather, it reflects school administrator assessment of what is "nice but not necessary" in the face of budget cuts and scarce resources.

[14]Berman and McLaughlin.

Table 2.13

Components of Project Innovation

(Respondent: School District IV-C Project Director)

Listed below are innovations which some projects have tried to make. Which of these would you say are MAJOR components of your project? (Circle all that apply)

Innovation	% Projects Utilizing Innovative Strategy: Weighted Sample
New teaching method for existing subjects	47
New course offering in the regular curriculum	27
New use or retraining of teachers and other school-related personnel	48
Major reorganization of the school and/or curriculum	16
Supplementary and/or enrichment courses and activities	52
New ways to achieve community understanding, participation, or racial or social integration	31
New use of technology to reach more persons more efficiently	25
New guidance, counseling and testing, or remedial services	24
Planning, evaluation, and dissemination services	32
Special education for the handicapped	14
New materials	47
Other[a]	11

NOTE: Weighted N = 16,432.

[a]"Other" innovative components include adult education, student assessment techniques, approaches to student discipline, preschool programs, and research on teacher effectiveness.

Table 2.12

Project Curricular Components

(Respondent: School District IV-C Project Director)

(If) your project is aimed at one or more particular (curriculum areas), which particular area? (Circle all that apply)

Curriculum Area	% Projects Addressing Curriculum Area; Weighted Sample
Reading, Spelling, or English	29
Mathematics	28
Secondary or foreign Languages	3
Social or Cultural Studies	16
Arts and Music	9
Environment and Ecology	11
Science	22
Careeer Education or Vocational Education	25
Special Education	17
Health, Drugs, or Sex Education	7
Gifted and Talented	14
Nutrition/Health	7
Dropout Prevention	7
Early Childhood	10
Bilingual	4
Other[a]	25

NOTE: Weighted N = 12,256.

[a]"Other" project components included such activities as physical education, performing arts, computer technology, and speech.

organizational objectives. In order to gain a more complete picture of how project objectives and techniques were combined in practice, we used factor analytic techniques to identify correlations among local responses. This statistical procedure is designed to reduce a large number of elements, such as those in Tables 2.12 and 2.13, into a smaller number of underlying dimensions. The validity of factor analysis, apart from technical considerations, rests on whether the factors, or underlying dimensions, have any logical meaning. Factor analysis of the curricular and strategic components chosen by local project directors indicates that these project components do cluster in an understandable way and that the factors provide a meaningful way to describe the educational methods chosen by IV-C projects in our sample.

Table 2.14 presents the results of a factor analysis designed to discriminate a smaller number of underlying educational project types. Ten distinctive project types emerged from the original 25 project components[18]:

- *Social/Environmental Studies.* These projects adopt a general focus on understanding the natural and social environment, and use all implementation strategies more or less equally. Social/environmental studies projects typically are funded at less than $25,000 and constitute approximately 8 percent of the IV-C projects in our study.
- *Language Training.* Language training projects include both bilingual education and more traditional forms of foreign language training. Projects are typically funded at less that $25,000 and about one percent of our sample projects fall into this category.
- *Special Education.* This project type focuses on education for the handicapped and on identifying new ways to serve this target population. Approximately 13 percent of our sample fits this project type; funding for special education projects is evenly distributed between $25,000 and $100,000.
- *Training/Staff Development.* This project type characterizes local activities that center on the dissemination of new practices and training staff in new methods. The factor loading on this project type indicates that these projects, more than any other, often include parent training as part of their activities. Training/staff development projects make up 17 percent of our sample and vary greatly in size, with grants ranging from less than $10,000 up to $100,000.
- *Career Education.* These projects focus on counseling students about career opportunities and providing job skills. The factor scores indicate that many projects adopt a remedial focus, through course content such as qualifying level math, spelling, or reading. Career education describes 14 percent of the sample projects; funding usually falls between $10,000 and $100,000.
- *Supplementary/Enrichment.* Supplementary/enrichment projects are aimed at developing new materials for the existing curriculum. Factor scores indicate that this project strategy is most often associated with early

[18]Project factor scores were cross-tabulated with project grant size to show funding patterns for project types. Frequencies of projects loading two or more of the project components were used to calculate the distribution of project types in our sample.

childhood education and programs for the gifted and talented. These are generally smaller projects, with funding distributed from less than $10,000 to $50,000; 28 percent of the projects in our sample are characterized by this project type. This suggests that while a focus on gifted and talented and early childhood education dominates this project type, other curricular areas are addressed by this strategy as well. (In particular, the correlation between supplementary/enrichment and career education is .27 (P = .00).)

- *Health and Nutrition.* The factor scores indicate that projects focusing on health and nutrition are more likely than other project types to constitute a new, regular course offering. Health and nutrition projects constitute 4 percent of our sample and are typically funded at less than $10,000.
- *Math.* The association between math and reorganization of the school or curriculum accords with project descriptions in our sample. Many math projects focus on introduction of metric education or the redesign of math curricula to incorporate new technologies such as computers and calculators. Ten percent of our sample fits this project type; funding varies greatly, being evenly distributed between projects funded at less than $10,000 and those ranging up to $100,000 a year.
- *Arts/Music.* An arts/music project focus is not associated with other substantive objectives or with any particular implementation strategy. This suggests that art/music projects are offered both as enrichment and as regular courses to a variety of student groups. Ten percent of our sample projects focus on art/music, with funding ranging from $10,000 to $50,000 a year.
- *Reading/English.* Like art/music, this project type is described by a single factor, suggesting that no particular strategy or secondary objective is strongly associated with reading/English projects. The variety of implementation strategies employed by reading/English projects is reflected in the project type's broad funding range, which is evenly distributed between $10,000 and $100,000; 29 percent of the projects in our sample can be described by this project type.

These project types are also useful in identifying the kinds of project activities typically supported by the various IV-C funding strategies. Table 2.15 presents the result of cross-tabular analyses that examined the relationships among project types and particular grant categories.[16] The data presented in this table are particularly interesting when viewed in light of reported changes in program priorities, funding strategies, and local needs. For example, mini grants generally support projects that could be called "frills"—art/music, health and nutrition, and social/environmental studies. These smaller, less competitive grants are used to fund activities that many school personnel see as important to the overall quality of district programs but yet removed from the core district curriculum. Few of the larger development and dissemination grants are used to support these activities.

The project types typically funded from these larger grant sources correspond with state and local IV-C program staff reports about the relationship between

[16]The distribution of project grant categories shown for our local sample corresponds directly with the mix of funding strategies reported by state level IV-C staff. This high correlation suggests that our sample projects are very representative of IV-C projects across the country.

Table 2.14

Factor Analysis of Project Components

Project Component	Rotated Factor Loadings									
	Social/ Environmental	Language Training	Special Education	Training/Staff Development	Career Education	Supplementary/ Enrichment	Health & Nutrition	Math	Music	Reading/ English
Project Curricular Components	.135	.044	.047	.080	.028	-.026	-.001	.089	.179	.597
Reading, Spelling, or English	-.001	.018	.017	.128	-.169	.201	-.062	.619	-.041	.305
Math	.131	.703	.194	.104	.004	-.017	-.008	.117	.146	.075
Secondary or Foreign Language	.539	.142	-.065	-.118	.014	-.015	.077	.003	.285	.175
Social or Cultural Studies	.085	.104	.024	.113	-.084	.065	.076	.053	.705	.172
Arts or Music	.784	-.057	-.002	-.118	-.004	.152	.159	-.024	-.009	.027
Environment and Ecology	.718	.066	-.055	.167	-.256	-.007	.049	.238	-.008	-.023
Science	.068	-.082	-.009	.135	.769	.112	.104	-.093	-.067	.018
Career or Vocational Education	.061	.153	.950	-.038	.050	.053	-.049	.076	.027	.105
Gifted and Talented	.062	.088	-.048	-.064	.037	.056	.757	-.025	.176	.046
Nutrition/Health	-.158	.220	.137	-.002	-.081	.432	.022	.063	.278	-.081
Dropout Prevention	.057	-.052	.015	.070	-.017	-.059	.660	-.049	-.033	-.037
Early Childhood	(.257)	-.058	.154	-.058	.156	.013	.005	-.045	-.084	.159
Bilingual	-.093	.498	.281	.116	-.019	.297	.040	.054	-.047	.047
Component Innovative Strategy	.013	.932	.061	.009	.064	.095	.072	.078	.065	-.031
New Teaching Method	.213	-.192	-.077	.001	(-.358)	.053	.013	-.174	.080	.213
New Regular Course Offering	.217	.090	-.090	.103	.141	.105	.327	.104	-.060	.012
Training School Personnel	-.177	.164	.070	.674	.001	.082	.028	-.069	-.156	.348
Reorganize School or Curriculum	.087	.147	.047	-.012	.061	-.055	.010	.591	.080	-.065
Supplementary or Enrichment	.289	-.055	-.147	.303	.070	.766	-.129	-.084	.148	-.131
Improved Community Understanding/ Participation	.315	.067	-.061	.542	.117	.093	.178	-.089	.184	-.028
New Communication Technologies	-.065	.124	-.109	.567	.235	.053	-.028	.160	.138	-.143
Counseling/Remedial Services	-.063	.072	.026	.314	.510	-.033	.002	-.017	.005	.077
Planning Evaluation dissemination	-.135	.020	.156	.563	.337	.279	.005	.241	.024	.135
Special Education for Handicapped	-.085	.212	.786	.020	.010	-.000	-.043	.008	.016	-.039
New Materials	.128	.154	.073	.056	.102	.449	.153	.093	-.149	.165

Respondent: LEA IV-C Project Director.

Table 2.15

LOCAL IV-C PROJECT GRANT TYPES BY PROJECT FOCUS

(Respondent: School District IV-C Project Director)

Grant Type	Projects Funded by Grant Type	Principal Project Focus
Mini grant	10%	Social/Environmental Studies; Health/ Nutrition; Art/Music
Adoption	26%	Staff Development/Training; Supplementary/Enrichment;Reading/ English/Math
Development	51%	Staff Development/Training; Supplementary/Enrichment
Dissemination	11%	Special Education; Staff Development/ Training; Reading/English
Supplementary Center	2%	Language Training; Staff Development/ Training; Career Education; Reading/ English

current IV-C activities and prior Title III and IV-C efforts. In particular, the projects typically funded by adoption grants—especially math and reading/English—mirror primary objectives for former Title III and IV-C development grants.[17] This shift reflects the view of many IV-C personnel that sufficient development has taken place in these core areas and that it is time now to disseminate and adopt exemplary efforts in math and reading/English.

The dissemination emphasis for special education provides an example of the interrelationship among federal policies and priorities. Approximately 50 percent of the special education projects in our study sample are development efforts; 25 percent are adoption and dissemination activities, respectively. This simultaneous activity in areas of adoption, dissemination, and development reflects the *need* for special education generated by PL 94-142, the 15 percent IV-C set-aside for the handicapped, and the concomitant belief that much work remains to be done in identifying effective practices for handicapped students mainstreamed into regular classrooms.

Similarly, the focus of development grants in our sample is consistent with the view of educators in our sample and others about current needs and problems.[18] In particular, staff development and training has come to be an important way to maintain the quality of district services in the face of budget cuts.[19] Districts can no longer rely on new recruits to generate fresh ideas and enthusiasm. Instead, the challenge for administrators is to make better use of existing staff. However, educators also agree that most of what is presently available in the area of staff development is not very useful or relevant. The focus of IV-C development grants on staff development and training can be seen as a response to this perceived need.

[17]See Berman and McLaughlin.

[18]See, for example, S. Abramovitz and S. Rosenfeld (eds.), *Declining Enrollment: The Challenge of the Coming Decade*, National Institute of Education, Washington, D.C., March 1978.

[19]See, for example, A. Lieberman and L. Miller (eds.), *Staff Development: New Demand, New Realities, New Perspectives*, Teachers College Press, New York, 1979.

Similarly, the focus on supplementary and enrichment projects can be viewed as an effort to develop ways to add new practices and materials to the existing district curriculum, enhancing overall quality without the expensive major overhauls that were possible during the "fatter" years of expanding enrollments and budgets.

Elements of Local Project Success

Because this study focused on state-level practices and policies, we could not gather detailed data on the components of local project success. However, we asked local project directors to rank a number of factors in terms of their importance in contributing to successful project outcomes. Averaging across all respondents produced the following ordering:

1. Staff enthusiasm
2. Good idea
3. Teacher involvement
4. District administrator's support
5. Training strategy
6. Project materials
7. Principal's support
8. Adequate funding
9. SEA support
10. School board support
11. Good timing
12. Community support

For these projects as well as for those described in Rand's earlier study, teacher attitudes dominate project outcomes. This suggests that mobilizing practitioner support remains the most crucial task facing district administrators and project directors. Likewise, it is worth noting that three of the four most important factors contributing to project success are *not* project design issues. The generation of staff enthusiasm, the meaningful involvement of teachers, and explicit administrative support for a special project are management concerns that must be faced by district personnel. These data support the general conclusion of the Change Agent Study: A "good idea" is necessary but not sufficient to ensure project success.[20]

Local Continuation

A central assumption underlying Title IV-C policy is that local districts will continue innovative projects begun with IV-C "seed money" after federal funding terminates. The disappointing rate of local continuation has concerned IV-C (and former Title III) staff at all levels.[21] The Change Agent study found that, more often than not, districts discontinued use of Title III project techniques and materials once federal support ended. Local officials found that they had neither the funds nor the local expertise to sustain project efforts without outside assistance. Concurrently with the initiation of Title IV, IV-C program officials in many states began efforts to promote local continuation through such strategies as continuation assurances on local grant applications and technical assistance aimed at helping districts find ways to incorporate IV-C project activities into their regular

[20]Berman and McLaughlin, Vols. 4 and 7.

[21]See Berman and McLaughlin, Vol. 7, for an assessment of project continuation under Title III and the local factors that support or impede project incorporation.

curriculum. At the same time, many local administrators were made aware of wasted opportunities when special projects disappeared, and they began to examine more closely the institutional requirements for continuation.

These state and local efforts appear to have boosted the extent to which IV-C innovative projects are continued. State IV-C directors estimate that, on average, 63 percent of the local projects supported by IV-C funds are continued. Local project directors predict that 44 percent of the current IV-C projects will continue "as is"; 41 percent report that their projects will probably continue with "some modification."

Our survey data do not tell us how much projected local modifications will change or dilute project objectives. Nor can we tell whether these estimates accurately predict district behavior once IV-C funding ends or simply reflect wishful thinking on the part of project directors. However, many district officials visited in the course of our fieldwork explained that they had made changes in their planning for the use of IV-C funds which resulted in increased project continuation. Local management changes we observed involved an increased emphasis on selecting projects that are central to district concerns (instead of "frills") and early attention to longer-term project staff training, materials, and financial requirements. This shift in local management of project funds seems to reflect increased local experience in grant management as well as a need to obtain maximum benefit from IV-C discretionary funds in a time of fiscal retrenchment.

We used multivariate analysis to explore further the extent to which state-level IV-C activities, local district characteristics, or IV-C project characteristics affect locally predicted project continuation (see Table 2.16). State-level program coordination apparently reduces the chances for local continuation. Both our fieldwork and the survey suggest that state-level coordination of IV-B and IV-C is associated with a strong and substantive state role in local IV-C projects. (Chapter 3 discusses state-level coordination and the factors influencing it in detail.) SEAs reporting a high level of coordination of Title IV program components typically show a high level of programmatic activity and involvement, as opposed to a more narrow "checkwriting" function. The negative relationship between local continuation predictions and state-level Title IV coordination suggests that local staff are less likely to continue projects where SEA staff have a strong substantive influence. Though state IV-C staff may see a strong substantive role as a way to bring statewide coherence to the IV-C program, local officials apparently do not always agree with state priorities. To this point, our fieldwork suggests that the negative relationship between relevance of SEA IV-C priorities and local continuation does not mean that locally irrelevant projects are more likely to be continued. Instead, it usually means that local staff have ignored state priorities, arguing the inappropriateness for their district, and have implemented IV-C projects that accord with *locally* specified priorities.

These data also suggest that state level activities to promote continuation, and SEA technical assistance activities, do significantly influence the likelihood of local continuation. In particular, SEA strategies to promote continuation through initial selection procedures negatively affect project continuation. Many SEAs instituted new grant application procedures aimed at promoting local attention to continuation and demonstrating the genuineness of local commitment to the project. For example, some state IV-C applications require that local officials sign an assurance

Table 2.16

Factors Affecting IV-C Project Continuation

Factor	Standard Regression Coefficient[a]
State-level coordination of IV-C with other state and federal programs	-.49***
Level of SEA IV-C involvement	.01
Number of SEA IV-C staff visits	-.30***
Perceived competence of SEA IV-C staff	.15***
Relevance of state IV-C priorities	-.33***
SEA IV-C strategy to promote continuation:	
a. Projects most capable of continuation selected	-.38***
b. Technical assistance during project planning	.42***
c. Technical assistance during implementation	-.25***
d. Projects helped to secure followup funding from other sources	.43***
SEA IV-C set aside for projects addressing state priorities	.20***
Percent local projects continued statewide	.27***
Timing of SEA technical assistance:	
a. Prior to project applications	-.01
b. During proposal development	.14***
c. After project funded	.06***
d. During evaluation	-.09***
Number SEA technical assistance services used	-.03***
District financial situation	.09***
Percent school district revenue from federal services	.06***
Average daily student membership	-.02***
School district innovativeness	.07***
Title IV-C grant size	-.07***
Project centrality to school district priorities	.12***
Do all school district schools participate?	-.16***
Planning/writing time for proposal	.02
Whether project director previously involved in other projects	-.08***
Confidence in validity of project evaluation	.04***
Whether district tried to coordinate IV-B and IV-C	-.10***
Title IV rating: Broad-based funds/services	.06***
	R^2 = .37
	Weighted N = 6164

[a]Readers may be concerned that some of these independent variables correlate highly with each other, and hence the coefficients may be imprecisely estimated because of multicollinearity. However, for this equation and all others included in the report, we tested extensively for multicollinearity and found none of the conventional symptoms.

*Significant at .10 level.

***Significant at the .01 level.

that, if successful, the project will be continued with local funds. But as one local federal programs manager commented, "[These assurances have] never meant anything to us. Who is to say what 'successful' means in district terms? So we sign it, but it is irrelevant to project continuation." Some SEAs also require that districts demonstrate, in their original application, provisions for the subsequent incorporation of IV-C activities into the regular curriculum. But, as with continuation assurances, these initial project selection criteria appear to induce little more than local grantsmanship. Ironically, these data indicate that when SEA staff try to select projects for continuation on the basis of grant application information or brief local site visits, their selections may be clouded by local grantsmanship and thus influenced by just the wrong criteria.

However, state-level assistance during the project planning stage aimed at maintaining the project once IV-C funding stops, promotes the likelihood of local continuation. In contrast to paper assurances and brief on-site visits, this mode of state assistance permits SEA IV-C staff to discuss anticipated continuation prob-

lems and help circumvent them in the planning stage. The positive effect of state IV-C assistance in local project planning is reflected in the influence of state technical assistance offered during proposal development. The negative influence of assistance during implementation, as well as the number of SEA IV-C staff visits, appear to reflect SEA involvement that is too late and often in response to a project in trouble. In short, these findings confirm conclusions of the Change Agent study about the factors affecting local continuation. In particular: Continuation is a problem that must be addressed during the proposal and planning stage; it is fundamentally a management problem, not a resource problem, and local administrators benefit from assistance in planning for it. Paper assurances or site visits are ineffective ways to assess whether the necessary management expertise or commitment exists. In working with local staff, SEA staff come to understand local operations better and can also provide districts with concrete advice on how to sustain IV-C projects. SEA IV-C staff efforts to identify supplementary funding for supporting local projects once the IV-C grant ends also increase local continuation. However, this strategy by itself is only a temporizing measure; like IV-C grants, other external funding cannot last forever.

The positive relationship between local continuation and estimates of IV-C project continuation statewide points to a state-level effect on continuation and underlines the differential contribution of SEA IV-C assistance strategies. Local districts within states having a higher than average continuation rate are more likely to continue IV-C projects.

Two project characteristics also substantially affect the likelihood of continuation: centrality and number of participating schools. Not surprisingly, projects that are viewed as central to district priorities are more likely to be continued after IV-C funding ends. Ancillary project efforts, activities that are seen as "nice but not necessary," have little chance to survive school board scrutiny as budgets are trimmed. Our fieldwork and survey responses, as well as the Change Agent study results, suggest that projects involving all district schools are likely to include "add-ons" to classroom operations: aides, special materials, and field trips. Yet, open-ended responses to our survey and Change Agent findings show that these are precisely the project components that are the most likely to be discontinued once special funding ends.[22]

This finding suggests that both state and local program staff need to take a hard look at adoption and development efforts. The gains achieved with special and expensive materials or classroom aides can be sustained only if the school district can provide them within their regular budget.

In summary, Title IV-C, like IV-B, is a popular program at the local level. The evolving mix of funding strategies chosen by SEA IV-C staff has made it possible for more and different types of school districts to participate in the IV-C program, and has shifted IV-C program objectives away from a unitary emphasis on the development of innovative projects to a complementary focus on support for local capacity-building efforts. These changes in program management represent the maturation of a federal policy, where the increased experience with the local

[22]Local IV-C project directors mentioned a number of project components that were to be dropped after IV-C funding ended: Parent groups, curriculum development, support personnel, inservice training, dissemination, materials, field trips, computer services, and evaluation were mentioned most frequently. Of these, project components, materials, and support personnel were mentioned most often. Project directors explained that the district could not afford them.

change process and the lessons learned from earlier development efforts can now be shared by a larger number of districts through adoption grants.

IV-C STRENGTHENING

Allocation of IV-C Strengthening Funds

The activities supported by IV-C strengthening funds have not changed significantly from those funded under the earlier Title V program. In a 1973 study of ESEA Title V, Jerome Murphy found that program funds typically were allocated to expand traditional SEA operations, primarily filling gaps in departmental management and services.[23] Similarly, we found that although states allocate a portion of IV-C strengthening funds to all of the express purposes of the strengthening component, various aspects of administrative support (including fiscal accountability and data systems) remain the highest priorities for the use of strengthening funds. As Table 2.17 shows, state-level developmental activities such as training and dissemination receive a much smaller share of IV-C strengthening funds.

Table 2.17

AVERAGE IV-C STRENGTHENING ALLOCATIONS, FY 78

Allocation	Percent
Administration	30
Accountability	20
Data systems	17
Curriculum	15
Dissemination	9
Regulation and training	9
Total	100

SOURCE: SEA Title IV annual program plans.

An important reason why the activities supported by Title IV-C strengthening funds have not changed significantly over the years may be that the objectives established for strengthening activities have remained the same: 89 percent of SEA Title IV directors report no change in strengthening objectives as a result of Title IV. The observation of a USOE on-site reviewer that the objectives for strengthening "have not been rewritten in five years" seems to be true for most states.

Neither have the strategies for allocating strengthening funds changed appreciably: 83 percent of responding Title IV directors said allocation strategies remain the same. Title IV-C, like the former Title V, continues to be seen as "the Chief's pot." Though Title IV directors are nominally accountable for the use of strengthening funds, Title IV officials in most states have little or no direct involvement in the determination or oversight of strengthening activities. Only 48 percent of our

[23] Jerome T. Murphy, *State Education Agencies and Discretionary Funds*, Lexington Books, Lexington, Massachusetts, 1974.

respondents indicated that the Title IV staff had any involvement in decisions about the use of strengthening funds, and only 5 percent said the Title IV staff had authority to make final decisions about the allocation of strengthening funds. However, 98 percent of the respondents indicated that the Chief State School Officer (CSSO) and his immediate staff were involved in deciding program priorities and allocations. Respondents also indicated that most state legislatures play a role in determining the use of strengthening funds. Their involvement generally reflects a process of negotiation over the annual budget, when the CSSO and legislators reach agreements about which activities will be supported by each funding source. In fact, in one of our fieldwork states, the SEA waits until the state fiscal year begins, and any items not included in the state budget are then funded with IV-C strengthening funds.

Since neither the objectives nor the allocation strategies for strengthening funds have changed as a result of Title IV, it is not surprising that over half of our respondents reported little or no integration between strengthening activities and the rest of the IV-C program. However, Title IV directors indicate a high level of integration between strengthening activities and other SEA activities. As one respondent put it, strengthening activities "are intimately related to most SEA activities." Or, as another respondent noted, "Strengthening funds are the resource common to all Department activities involving dissemination, curriculum, inservice, and technical assistance." Consultative services and technical assistance to all state department of education areas were mentioned most frequently; a substantial number of Title IV directors also reported using IV-C strengthening funds for federal liaison activities, federal program administration, legal services, and regulatory activity.

Only 29 percent of the Title IV directors indicated that strengthening funds were allocated to local school districts. However, there was a common focus in strengthening activities for those states using funds in this way. Most respondents indicated that strengthening funds were used to support "short-term strengthening activities," typically, school district management or evaluation concerns. For example, one of our fieldwork states reserves approximately 23 percent of its strengthening funds for grants to local districts. Awards are made on a competitive basis and the SEA encourages local districts to submit proposals in the $5,000 to $10,000 range, with the maximum grant being $20,000. These are one-year, nonrenewable grants and the SEA hopes local districts will use them as seed money. Typical projects train teachers and administrators in new instructional techniques. Strengthening funds pay for the initial training and then the local district provides resources to extend this inservice to other teachers.

The Impact of IV-C Strengthening

The Title IV-C strengthening program, like the former Title V program, has often been accused of "maintaining rather than strengthening." Or, as a USOE on-site reviewer noted after visiting one state, "A question [may be raised] whether or not supplanting of funds is being practiced."

Both our fieldwork and survey data suggest these concerns are well founded. However, 65 percent of Title IV directors also indicate that activities formerly

supported by strengthening funds have been incorporated into the regular SEA budget, as Congress hoped. Data processing and evaluation services were cited most frequently as examples.

Finally, we asked Title IV directors what they saw as the most important contribution of IV-C strengthening. The essential role of IV-C strengthening in maintaining SEA services was underscored by most respondents: "It keeps the SEA functioning"; "Critical to overall operation"; "Enables the state to acquire and maintain a staff more commensurate with needs than would otherwise be possible"; "Allows activities and services that would not get done"; "Without strengthening funds there wouldn't be any department, since state legislatures do not generally provide for departments of education." Our fieldwork evidence also supports this perception, particularly now that states face greater fiscal constraints. Because legislatures are less and less willing to increase administrative expenditures, such items as an SEA's research and development capability are especially vulnerable to budgetary cuts.

This situation underscores a fundamental paradox in the operation of the strengthening program. Original proponents hoped that strengthening funds would be used to expand the capacity of the SEAs and support the development of new programs and management strategies. However, prior to the 1965 passage of ESEA, state departments of education generally existed only to perform routine accounting and credentialing tasks. Most states lacked even the bare essentials of the programmatic capacity that federal policymakers hoped to expand. Furthermore, state legislators have traditionally preferred to allocate state funds for local district operations rather than to expand SEA activities.

Insofar as strengthening funds are assisting state departments of education in staffing and coordinating these programmatic functions, IV-C strengthening is accomplishing its purpose. From one perspective, strengthening funds are indeed supplanting what have come to be seen as routine SEA activities. Still, without strengthening funds, it is likely that in many states these central services would be substantially reduced, if not eliminated.

NONPUBLIC SCHOOL PARTICIPATION IN TITLE IV

The Title IV legislation requires that students attending nonpublic schools receive program benefits on an equitable basis with public school students. An *eligible* nonpublic school operates on a nonprofit basis and conforms with federal civil rights guarantees in its admission policies. To encourage local compliance with this mandate, SEAs must provide information and technical assistance that will facilitate nonpublic school participation.

One of the purposes of our research was to assess the extent and quality of nonpublic participation in local IV-B and IV-C projects. Our survey and fieldwork data indicate that both the rates and quality of nonpublic participation differ greatly for IV-B and IV-C. While problems still exist, most eligible nonpublic school students receive some type of IV-B services, but less than one-third of all IV-C projects include nonpublic school students.

Despite relatively low nonpublic participation in IV-C, SEA and nonpublic officials both report that participation is greater now than it was under Title III.

Local IV-C project directors also report that they now try harder to involve nonpublic students. Differences in IV-C participation contrast with that for IV-B; both SEA and nonpublic officials describe IV-B involvement as either the same as it was under the former categorical programs or as having increased only slightly. Local IV-B coordinators also report making no greater effort than before to involve nonpublic schools.

Nonpublic School Participation in IV-B

Local IV-B coordinators report that in about two-thirds (64.3 percent) of our sample districts, all eligible nonpublic students willing to participate receive IV-B services. In over four-fifths of the sample districts with eligible nonpublic schools, at least some nonpublic students receive IV-B services. But these figures are nationwide averages and mask a great deal of state and local variation. For example, 65.8 percent of nonpublic students nationwide receive IV-B services, but the range extends from a high of 100 percent in one state to a low of 10 percent in another.[24]

In some instances lack of nonpublic participation in IV-B can be blamed on state and local actions. In one of our fieldwork states, the prevailing norms oppose aid to nonpublic education in general and Roman Catholic schools in particular. This has made it extremely difficult for nonpublic students to receive any IV-B services. In one district, for example, funds that would ordinarily be used to purchase materials for nonpublic schools are allocated to a central media resource center. While center resources are ostensibly available to nonpublic students, the district will not deliver materials to nonpublic schools even though its van drives past them on a regular public school delivery route. Additionally, the decision to spend IV-B funds in this way was made unilaterally by the public school district with no participation from any nonpublic school.

Although we encountered other situations like this in our fieldwork, it appears that among the major reasons for nonparticipation in IV-B are decisions made by the nonpublic schools themselves. One reason for nonparticipation is a school's own ideology and views about the proper relationship between church and state. For example, in one state we visited, over 40 percent of the state's nonpublic schools are either Seventh-Day Adventist or fundamentalist Christian schools. These schools rarely accept federal aid because they want to avoid potential entanglements with government.

A second reason for nonparticipation is similar to that given by public school districts that refuse IV-B funds. Many nonpublic schools are small, and the value of any services and materials they would receive from IV-B is not worth the effort of applying for them. Consequently, some schools, particularly more affluent private academies, prefer to forgo IV-B services.

Although states and local districts must persist in their efforts to meet the federal mandate for nonpublic participation in IV-B, probably little more can be done to increase participation rates. The quality of participation may be a different matter, however.

Public and nonpublic school officials agreed in their estimates that nearly one-half of nonpublic school officials receiving IV-B services do not participate in

[24]SEA Title IV Director Questionnaire.

decisions about the kinds of materials and services that nonpublic students are to receive.[25] This situation may be at least partially due to the conflict between involving nonpublic schools in IV-B decisions that affect them and a desire to target IV-B funds for specific purposes. These two objectives can work at cross-purposes because the needs of public and nonpublic schools often differ. For example, our survey data show that, when given a choice, nonpublic schools request IV-B services different from those of public schools. The nonpublic schools spend significantly more IV-B funds on printed materials, textbooks, and audiovisual equipment, and significantly less on guidance and counseling, than do the public schools. Only the average amount spent on instructional equipment is similar for both groups.

These differences strongly suggest that even in districts that narrowly target their IV-B funds, funds normally allocated for nonpublic services and materials should be administered separately. In our fieldwork sites where nonpublic schools were most satisfied with the IV-B program, they were allowed to determine what services and materials they would receive with IV-B funds. The district federal programs director usually meets with the nonpublic schools and encourages them to conduct their own planning and need-assessment similar to that undertaken by the public schools. Nonpublic schools are asked to think of IV-B not as "free money" but as a way to meet some school objective, perhaps over the course of several years. In this way, nonpublic schools receive services that meet their own needs and still avoid using IV-B as merely a "grab bag of goodies."

Despite these problems with the quality of nonpublic participation, the majority of our nonpublic respondents are satisfied with the IV-B program and view its benefits as appropriate to their needs.[26] Most of their complaints about IV-B mirrored those made by public school respondents—namely, the amount of paperwork, given the level of funding and delays in receiving program materials.[27] In sum, the IV-B program essentially seems to be meeting Congress's desire for equitable nonpublic participation.

Nonpublic School Participation in IV-C

Extent and Quality of Participation. The problems of nonpublic involvement in local IV-C projects stem not only from the low level and quality of participation,

[25]Of the local IV-B administrators in our sample, 45.2 percent reported that nonpublic schools in their districts do not participate at all in decisions about the level and distribution of the IV-B services they receive. When a similar question was asked of nonpublic school principals, 49.1 percent reported not participating in these decisions.

[26]The survey question and frequency of response was:

"On the whole, how appropriate to your school's needs are the goods and services you have received under Title IV Part B?"

	Not at all appropriate				Highly appropriate	
Respondent:						
Nonpublic Principals	1.1%	4.3%	12.4%	29.2%	53.0%	N = 329
Respondent:						
Nonpublic Superintendents	0%	15.6%	13.3%	26.7%	44.4%	N = 45

[27]In comments about the IV-B program, some public and nonpublic school officials have argued that delays in receipt of materials for nonpublic schools are due to a lack of administrative funds for districts servicing nonpublic schools. Our field and survey data indicate that this lack is a serious problem in the

but also from a fairly general lack of information about IV-C opportunities available to nonpublic schools. For example, 39.4 percent of the nonpublic principals in our sample did not even know whether their local public school district had applied for IV-C funds in 1978. A third of all SEA IV-C coordinators responding to our survey could not estimate how many nonpublic students participate in the state's IV-C projects.

Their general lack of information leads to differing estimates of nonpublic school participation. According to SEA IV-C coordinators, an average of 13.5 percent of all eligible nonpublic students participate in IV-C projects. In contrast, our survey of local IV-C projects yields estimates for the ratio of project participants to the total nonpublic student population that are not only lower than the states' estimates, but that are also significantly lower than the participation rate for public school students. In our sample of local IV-C projects, an average of 4.4 percent of all eligible nonpublic students in a district participate in a IV-C project, as opposed to 9.7 percent of public school students.[28]

Because federal regulations require that *all* IV-C projects include equitable nonpublic participation, the most relevant figures are not the proportion of nonpublic students served, but rather the proportion of IV-C projects that include nonpublic participation. Again, estimates vary among respondents, with SEA IV-C coordinators reporting that on average one-third (33.7 percent) of all IV-C projects include nonpublic students, and local federal programs managers reporting that 25.6 percent of their IV-C projects include nonpublic schools.[29] Even assuming that the higher figure is the more accurate, it is clear that the federal requirement for equitable nonpublic participation in IV-C projects is not being met.

In addition to rates of nonpublic school involvement, there are also questions about the quality of that participation. Our fieldwork data indicate that even when nonpublic schools participate in local IV-C projects, their involvement is neither as extensive nor as sustained as it is for public school students. Often, participation means no more than the attendance of several nonpublic teachers at an inservice meeting or, as in the case of another fieldwork site, a diagnostic test administered to nonpublic students but with no follow-up by the IV-C project. Another nonpublic superintendent in a large urban school district reported actively seeking nonpublic involvement in several IV-C projects. At the end of two years, she had three loose-leaf binders on teacher inservice and a collection of biological specimens (frogs, bugs, etc.) to show for her efforts.

Another indicator of the quality of nonpublic participation is the extent to which nonpublic needs are considered at the time when districts design projects and apply for IV-C funding. As Table 2.18 illustrates, few nonpublic principals and superintendents report being consulted by the public school district or participating in the design of IV-C projects. Likewise, nonpublic officials felt that public school districts expend only a moderate amount of effort to involve them in IV-C activities.

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country's largest districts, which may have to deal with hundreds of nonpublic schools. In the majority of the nation's districts, however, according to our respondents, servicing nonpublic schools does not cause problems or impose an undue administrative burden on the public school district.

[28]The estimates are based on reports by local IV-C project directors' survey responses on the number of public and nonpublic school students participating in their projects. These figures were then divided by the total number of public and eligible nonpublic students in a district. The difference between the two means is significant at the .01 level.

[29]Both of these figures are considerably below that cited by Rev. Patrick Farrell of the U.S. Catholic Conference in his September 21, 1977 testimony before Congress. Farrell stated that in a survey of Catholic school officials, participation was estimated at 50 percent of all IV-C funded projects.

Table 2.18

NONPUBLIC SCHOOL INVOLVEMENT IN IV-C PROJECT DESIGN

(Respondents: Nonpublic school principals and superintendents)

On the whole, how much effort did the local public school district make to involve your school or school system in Part C activities?

	None				A Great Deal	
	1	2	3	4	5	
Principal	16.2	25.2	27.9	21.6	9.0	N = 111
Superintendent	26.1	43.5	17.4	4.3	8.7	N = 23

Were you consulted before the focus and intent of projects (e.g., subject areas, grade levels) were determined?

	Principal	Superintendent
Yes	39.4%	20%
No	60.6%	80%
	N = 109	N = 25

Did you or personnel from a nonpublic system to which you belong have input into any aspects of the Title IV, Part C design?

	Principal	Superintendent
Yes	37.7%	44.4%
No	62.3%	55.6%
	N = 106	N = 28

Reasons for Nonparticipation. In examining the factors that contribute to low levels of nonpublic involvement in IV-C, we need to consider the concerns and behavior of all relevant actors: SEAs, local districts, and the nonpublic schools themselves. SEA IV-C coordinators maintained that the assurances they require from districts indicating meaningful participation in IV-C projects by nonpublic schools were quite effective.[30] However, these assurances have not produced significant nonpublic involvement in a majority of IV-C projects. During our fieldwork analysis we found that assurances are rarely verified and SEAs often fund projects that lack even pro forma assurances.

While most SEAs disseminate information about federal requirements for nonpublic involvement as part of their regular newsletters and workshops, few make any additional effort to encourage nonpublic participation. Local IV-C project directors report that less than a third of the nation's SEAs offer technical assistance on

[30]The survey question and frequency of responses were:
"In your view, how effective are the assurances you require of local school districts in ensuring meaningful participation of nonpublic school students in Title IV Part C projects?"

Not at all effective			Very effective	
9.8%	26.8%	41.5%	22.0%	N = 41

the involvement of nonpublic students, and only about a fourth of the districts in states offering such assistance actually take advantage of it.

The competitive nature of IV-C funding also discourages nonpublic involvement. Not only do districts face time pressures in preparing grant applications, but their major interest is to design a project whose focus and quality enhance the district's competitive advantage. Sometimes meeting this objective means that districts are unresponsive to nonpublic concerns because they believe accommodating nonpublic needs will weaken their overall proposal.

A common scenario, then, is for public school districts to develop a project without consulting any nonpublic schools in the district. Several days before the grant application is due, a district official will call a nonpublic principal or superintendent who has been cooperative in the past. The nonpublic official will sign an assurance stating that he was informed about the project. Under these circumstances, however, the nonpublic official's signature on a state-mandated assurance does not mean that he participated in the project's design or that the project meets his school's needs. In fact, districts will often design a IV-C project for secondary students when the only nonpublic schools in the district serve elementary students. Or a project may focus on an instructional method or subject area not even offered in the nonpublic schools (e.g., individualized instruction, vocational education). Furthermore, the signature of one nonpublic official does not necessarily mean that all nonpublic schools in the district are aware of the project and would decline participation if offered.

To some extent the characteristics of nonpublic schools themselves also contribute to low rates of nonpublic involvement. In our fieldwork we found that nonpublic principals (including those affiliated with a centralized system such as a Roman Catholic diocese) are often very ill informed about federal aid programs. Additionally, nonpublic schools tend to operate on very tight budgets and lack the administrative capacity and teacher release time to participate in planning and subsequent project activities. In a number of districts we visited, it also seemed that nonpublic school officials had made a conscious decision not to push the public school district on IV-C participation. They enjoy a basically productive relationship with the district, which provides them other sevices. The nonpublic officials perceived IV-C of only marginal benefit to their students and not worth jeopardizing their otherwise good relationship with the district. At the state level, nonpublic associations tend not to be well organized, and therefore exert little influence over SEA policy on nonpublic involvement.

Factors Contributing to Nonpublic School Involvement. Despite the low rate of nonpublic schools' involvement in IV-C, some of them have successfully participated in project activities. To determine what distinguishes these schools from their nonparticipating counterparts, we used multivariate analysis. Table 2.19 shows the independent effect of various nonpublic and local district characteristics, and of different SEA strategies, on the percentage of IV-C projects that involve nonpublic schools. Combined with our fieldwork findings, these results should help us to identify ways that nonpublic participation can be increased.

Unfortunately, only two of the four factors found to be significant in predicting nonpublic involvement are amenable to manipulation by policymakers: a nonpublic school's membership in a federation or centralized system as a positive determinant, and direct SEA communication with nonpublic schools as a negative predictor.

Table 2.19

DETERMINANTS OF NONPUBLIC IV-C PARTICIPATION: PERCENT OF LOCAL IV-C PROJECTS INVOLVING NONPUBLIC SCHOOLS

Determinant	Standardized Regression Coefficient
Nonpublic enrollment	.07
Whether nonpublic school religiously affiliated	-.15*
Whether member of federation or centralized system	.21
Relationship between nonpublic and local school district	.04**
Nonpublic enrollment as proportion of local school district's school-age population	-.32*
Present financial status of local school district	-.21
Whether local school district exerted greater effort to involve nonpublics since consolidation	.05
Whether SEA offers technical assistance on nonpublic involvement	.04***
Whether SEA communicates directly with nonpublics	-.38
	R^2 = .30
	N = 73

*Significant at .10 level.
**Significant at .05 level.
***Significant at .01 level.

The other significant factors cannot be altered to increase nonpublic participation. Contrary to our initial expectations, we found that nonpublic schools are more likely to be involved in IV-C projects if they account for a smaller fraction of the school-age population. Public school districts may feel less threatened when nonpublic schools constitute a distinct minority, or they may find it easier to coordinate participation if there are fewer nonpublic schools and students. Also surprising was the finding that poorer districts are more likely than affluent ones to involve nonpublic schools in their IV-C projects.

The finding that states communicating directly with nonpublic schools are less likely to achieve a high percentage of nonpublic involvement raises some serious questions about SEA strategies to increase nonpublic participation. Our fieldwork suggests that the reason for this negative effect lies in the nature of SEA nonpublic communications.

Many states simply send out copies of the federal regulations governing nonpublic involvement and inform nonpublic schools of their right to participate. However, SEA communications do not describe specific district projects being developed. Rather, it is often after a nonpublic school registers a complaint about its exclusion from a local project that an SEA actually deals with the nonpublic school on project specifics rather than on the generalities of federal requirements. This measure, then, may be tapping both the uselessness of routine SEA communications and the fact that more specific communication with nonpublic schools comes only after they have been excluded from effective IV-C involvement. Given that few local districts use available SEA technical assistance on nonpublic involvement, it is not surprising that this strategy has no significant effect on increasing the number of IV-C projects with nonpublic participation.

Still, our fieldwork suggests that there are some steps SEAs can take to increase nonpublic involvement. First, they need to make a greater effort to identify

eligible nonpublic schools within their states. In the course of tracking our nonpublic sample, we found that many states lack even a list of the eligible nonpublic schools located within their boundaries. Second, SEAs need to make certain that assurances of nonpublic participation are valid. It obviously costs too much to verify all project applications; but if SEAs were to verify at least a random sample of IV-C projects, public school districts might heed the requirements for such assurances more carefully.

Some SEAs have tried to increase nonpublic participation by establishing a nonpublic bureau or liaison within the state department. As is often the case with such structural changes, the mere act of establishing this position does not guarantee increased nonpublic participation, and the results have varied across states. For example, in one fieldwork state the nonpublic bureau exercises no measurable effect on nonpublic involvement. The bureau ranks low in the departmental hierarchy and consequently has no influence over program directors or access to those setting SEA policy. In addition, the head of this bureau lacks experience in nonpublic education, and therefore has little credibility with the nonpublic schools he is supposed to serve. In another fieldwork state the nonpublic liaison has created just the opposite effect. This person reports directly to the federal programs director, has extensive experience in nonpublic education, and works effectively with the state's nonpublic schools. In other words, with the right person occupying the position and with sufficient support from SEA leadership, a nonpublic liaison or bureau can significantly increase nonpublic participation.

Finally, those states that established substantive priorities for local IV-C projects need to consider the trade-offs between the benefits derived from a focused, statewide IV-C program and nonpublic involvement. Nonpublic respondents report that it is more difficult for them to participate if local projects need to reflect state priorities, because these priorities are often inappropriate to nonpublic school needs. For example, one state's 1980 priorities include projects for schools with high concentrations of underachieving students. Nonpublic schools are unlikely to participate in these projects because they tend to include proportionately fewer underachieving students, even when one controls for socioeconomic status.

The positive relationship between federated or centrally organized nonpublic schools and IV-C involvement suggests the advantages that better-organized nonpublic schools enjoy. Clearly, many nonpublic schools value their independence and do not want to compromise it by joining a larger system. But even loosely structured federations can serve to improve IV-C participation for their members. Their major advantage is to increase the level of available information about federal aid programs. Our fieldwork indicates that many nonpublic schools need better and more extensive information about these programs. Even those that belong to a centrally organized system may be located hundreds of miles from the central office and lack the information needed to deal with districts on a daily basis. Nonpublic organizations can also provide their member schools with the motivation and tools needed to monitor the quality of public school district assurances.

In sum, nonpublic participation in Title IV varies greatly between Parts B and C. While some problems still exist with IV-B, the majority of eligible nonpublic schools receive services and find them appropriate to their needs. Since only about one-third to one-quarter of IV-C projects include nonpublic students, federal requirements for equitable participation are presently unmet. There is also a serious

question about the quality of involvement for those nonpublic students that do participate. Efforts to change the present situation need to come from SEAs and local districts as well as from nonpublic schools themselves.

STATE ADVISORY COUNCILS

As part of the Title IV consolidation, existing Title III State Advisory Councils (SACs) were expanded to represent the various categorical interests now consolidated into Title IV. In addition to this membership expansion, federal regulations also defined greater SAC responsibilities. Besides advising SEAs on program administration, state plan preparation, and development of criteria for funds allocation, SACs are required to evaluate all Title IV programs. Federal regulations mandate that SACs submit a report every three years outlining their activities, recommendations, and evaluations. They are also authorized to obtain necessary professional and clerical services to meet their responsibilities. Beyond these mandates, however, federal regulations are vague and SACs are unclear about what their evaluation responsibilities actually entail.

This section describes how SACs function: their membership, relationship with SEA staff, level of resources, and scope of responsibilities. In assessing the determinants of SAC influence, we can begin to see how federal regulations have been translated into practice.

SAC Activities

The majority of SAC members are appointed by the chief state school officer with little or no input from such other state institutions as the state board of education, legislature, or governor's office. SAC membership clearly reflects the categories mandated by federal regulations: professionals representing public elementary and secondary schools, nonpublic schools, institutions of higher learning, school libraries, guidance and counseling, and special education. However, less than a fifth of the states have a formal process by which relevant professional organizations and local district officials can nominate SAC candidates. Membership selection is usually made through the informal professional networks that exist in every state. Chief state school officers and their staffs also tend to select people with whom they have worked in the past.

Most SACs have between 12 to 20 members, who serve two- to three-year terms. On average SACs meet six times a year. Only about a fifth of the states pay an honorarium for attendance at SAC meetings, but nearly all reimburse members for their travel expenses. Despite the federal authority allowing SACs to hire needed staff, only about ten percent have a staff solely responsible to them. SACs spend an average of $25,000 a year, with six reporting no expenditures and two spending over $100,000. However, the majority of our sample believe that the level of support provided for SAC activities is adequate or better.[31]

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[31]The survey question and frequency of response was:

"In general, do you consider the level of financial support provided for State Advisory Council activities to be adequate?"

Most SAC members in our sample (85.7 percent) reported that their relationship with SEA Title IV staff is very good. Despite only limited personal contact with USOE staff—in only about half the states do SAC members participate in USOE on-site visits—most SAC members find USOE activities helpful. Among the activities they rate most highly are: telephone assistance, interpretation of Title IV guidelines, and USOE participation in Association of State Advisory Councils activities.

SAC activities across the country reflect a common pattern. SACs spend the bulk of their time on IV-C (an average of 60 percent) and relatively little time on IV-B (22 percent) and IV-C strengthening issues (14.5 percent). Not only is their range of responsibilities for IV-C broader than for the other parts of Title IV, but SAC members also believe that their greatest influence is over IV-C local project funding decisions.

In most states, SAC members review all IV-C grant proposals and play an active and equal role with SEA staff in final funding decisions. SAC members in over half the states visit local projects once a month or oftener. A majority also report above-average involvement in the IV-C evaluations conducted by the state. SAC members assist in establishing evaluation procedures, participate in the evaluations, and review the final reports.

SAC members' involvement in state IV-B activities is more modest: their visits to local IV-B projects are less frequent than those to IV-C projects and they report a significantly smaller role in the IV-B evaluation (see Table 2.20). Despite this difference, SAC members report that they are equally satisfied with their levels of influence over the two programs.

There are two basic reasons for the differences between SAC involvement in IV-B and IV-C. The first reflects the status of IV-B as an entitlement program with a limited state role. Although the states are required to evaluate local projects, their evaluations are usually fiscal, rather than substantive. Hence the nature of IV-B limits the SAC's role and means that any role a Council does play is less clear than for IV-C. The second reason for the difference between Parts B and C is the composition of SAC membership. Most SAC members have backgrounds and experience more appropriate to IV-C than to IV-B. Many have directed IV-C projects or, as school administrators, supervised others in this task. Consequently, SAC members often feel more comfortable with IV-C than IV-B and are more certain of the contribution they can make to state administration of the program.

Compared with its role in IV-B and IV-C activities, SAC involvement in IV-C strengthening is minimal. Only a fifth of the country's SACs play any role, and that a limited one, in the funding process for IV-C strengthening. Most SACs have little to do with IV-C strengthening evaluations, and most report little or no knowledge of state-level program administration. Of those responding to an open-ended question, 40 percent mentioned IV-C strengthening as the area of Title IV program

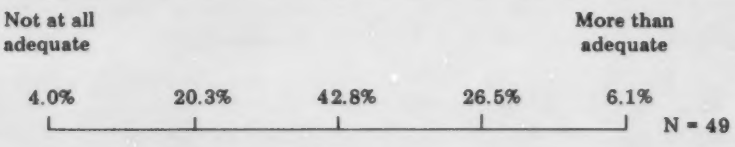

Table 2.20

ROLE OF SAC IN TITLE IV EVALUATION PROCESS

	Not at all involved				Very involved
Overall involvement in the Part B evaluation process	16.4%	24.4%	40.8%	14.3%	4.1%
	Not at all involved				Very involved
Overall involvement in the Part C (Innovative Projects) evaluation process	4.1%	10.2%	18.3%	49.0%	18.4%
	Not at all involved				Very involved
Overall involvement in the Part C (Strengthening) evaluation process	24.5%	32.7%	34.7%	8.2%	0%

N = 49

administration in which they would most like to see SAC influence increase. Along with the need for more time to do their job, SAC members also cited IV-C strengthening as their greatest problem in fulfilling their Council responsibilities.

Because most SEAs view IV-C strengthening as discretionary funds under the control of the chief state school officer (CSSO), there has been little SAC involvement or influence. During our fieldwork discussions, high-level SEA staff were quite candid in describing IV-C strengthening funds as controlled by the CSSO and outside the scope of SAC influence. This situation has frustrated SAC members. A few, in states where the SAC has its own staff or independent source of influence, have been able to exert some influence over the use of IV-C strengthening funds. Consequently, in these states, some IV-C strengthening funds are likely to be awarded to local school districts.

SAC members' expressed frustration over IV-C strengthening arises not so much from disagreement with CSSOs over use of the funds, but rather from an inability to meet their mandated responsibility. Federal regulations state that SACs are to evaluate *all* programs funded under Title IV, and this is not presently being done for IV-C strengthening. As one SAC member wondered, "If the federal government simply wants to send money to SEAs, why does it bother to dilly-dally around and ask for SAC involvement? If the money is basically free money to the SEA, then it should be treated as such."

SAC Impact

Despite some significant differences among respondents, SAC members and SEA staff are consistent in their perceptions of Council impact—particularly, the assessments of SAC members and Title IV directors (Table 2.21). Given the limited role of SACs in the IV-B program, it is not surprising that IV-B coordinators rate SAC impact lower than the others.

Consistent with members' own perceptions, SEA staff see the SAC as having its greatest impact on IV-C, especially in the selection of projects for funding. Beyond their influence over specific parts of Title IV, SACs also affect the program more generally. In our fieldwork discussions, SEA staff often describe SACs as oversight bodies that "keep the staff honest." Staff members mentioned that they have had to become clearer and better able to defend their program recommendations because of the SAC's presence. Because SAC members are also an important link between local districts and the state, they keep SEA staff more responsive to local concerns. At times, individual SAC members have also been critical in keeping the interests of the groups they represent (e.g., gifted children, nonpublic schools) on the state program agenda.

Table 2.21
SAC Impact

Overall, how much impact would you say that the SAC has had on the way Title IV operates in your state?

	No Impact				Major Impact	
SAC members	4.0%	4.1%	26.5%	51%	14.3%	N = 49
SEA Title IV Directors	0%	4.8%	26.2%	45.2%	23.8%	N = 42
SEA Part B Coordinators	2.0%	12.2%	44.9%	30.6%	10.2%	N = 49
SEA Part C Coordinators	0%	9.7%	17.1%	39.0%	34.1%	N = 41

Most SACs, then, function as advisory bodies with no independent policymaking authority, but they are not "rubber stamps" for the SEA staff. In most states, SAC influence has measurably affected the Title IV program. Often this difference is reflected in the kinds of local projects that are funded and in the way SEA staff deal with local districts.

To determine what factors contribute to high SAC impact, we performed a series of multivariate analyses. Tables 2.22 and 2.23 show the results, based on measures obtained from SEA staff and on SAC perceptions of both their overall impact and their influence over IV-B and IV-C funding decisions.[32]

Because SAC relationships differ across Title IV program components, we would not expect the same factors to be significant predictors for all programs and respondents. However, those interested in increasing SAC influence would probably do well to consider several factors that are significant across respondents. The first is the level of SAC knowledge about program activities. According to both SAC members and SEA staff, this is a critical factor. Although some SAC members complained about receiving reports and program information as thick as telephone books, nearly all respondents expressed satisfaction with the information they received. Knowledge of program activities comes not only from printed information, however, but also from involvement in program activities. Here the concern of SAC members that they do not have enough time for their tasks is important. Perhaps more SEAs might want to consider funding additional release time for SAC members so that they will have more time away from school district duties to fulfill their SAC responsibilities.

About a quarter of the respondents in our sample believed that they had received inadequate orientation. Some SACs still have not prepared handbooks or special orientation sessions for new members. As one SAC member noted, the process can be a "very cold bath" without such preparation. An inadequate orientation means that a new member cannot effectively participate in Council business for several months or even a year.

From the perspective of SEA staff, another critical factor is staff feelings about the SAC's role. If staff believe that the SAC is playing a unique and useful role and not usurping staff functions, the SAC is more likely to have a positive effect.

In sum, the extent to which SACs are meeting federal regulations that outline their responsibilities differs across the Title IV program. In most states, SACs are active and influential in IV-C activities. Their role in IV-B is more limited, but nevertheless includes participation in IV-B evaluation activities; their involvement in IV-C strengthening ranges from extremely limited to nonexistent. Despite these differences, Council members and SEA staff agree that SACs have measurably and positively affected Title IV operations.

[32]Because SAC involvement in IV-C strengthening is so limited, we were unable to fit a model that predicts SAC influence over this program component.

Table 2.22

DETERMINANTS OF SAC IMPACT
(As perceived by SEA Title IV Staff)

Determinant		Standardized Regression Coefficients: Title IV Director	Part B Coordinator	Part C Coordinator
SEA resources provided SAC		-.05*	.28**	.05
SAC knowledge of program activities		.35**	.20	.41***
Frequency of SAC-SEA staff interaction		.32**	.08	.17
SEA staff perception of SAC legitimacy[a]		.16	.29**	.44***
	R^2	.24	.32	.62
	N	41	46	40

*Significant at .10 level.
**Significant at .05 level.
***Significant at .01 level.

[a]This measure is based on a survey question that asked:
In general, would you say most SAC activities:
—Are most effectively done by the SAC
—Could be done as well or as efficiently by the State Department of Education
—Could be done better or more efficiently by the State Department of Education

Table 2.23

DETERMINANTS OF SAC IMPACT AS PERCEIVED BY SAC MEMBERS

Determinant	Standardized Regression Coefficient: Overall Impact	Influence Over IV-B Funding Decisions	Influence Over IV-C Funding Decisions
Adequacy of financial support provided SAC	.07	.02	.23*
Adequacy of SAC orientation	.27**	.11	.26*
SAC knowledge of local IV-B projects	.04	.27**	—
SAC knowledge of local IV-C projects	.22	—	.02
SAC knowledge of state-level IV-B administration	.01	.25*	—
SAC knowledge of state-level innovative project administration	.32	—	.32*
SAC knowledge of state-level IV-C strengthening administration	.12	—	—
Basis for SAC decisions[a]	.12	.00	.08
Frequency of SAC contact with local projects	—	-.34**	.09
Whether SAC more knowledgeable about IV-B or IV-C	—	.06	-.08
R^2	.53	.27	.24
N	48	48	48

[a]This measure is based on a survey question that asked: What is your perception of the approach that Council members generally use in making decisions:

—Try to represent the views/interests of the groups they were selected to represent
—Try to represent the views/interests of the individual or group that appointed them
—Try to make decisions in accordance with their own judgment

*Significant at .10 level.
**Significant at .05 level.

Chapter 3

TITLE IV AS A CONSOLIDATED PROGRAM

Federal program consolidation is not a new idea. Congressional consideration of consolidation as a "major step toward streamlining the fragmented federal assistance system" began in the late 1940s.[1] However, the first major consolidations in manpower, community development, and social services policy were legislated only after 1970. Consolidation of federal education programs came later and, as a funding strategy, never enjoyed the same prominence it did in other policy areas. Title IV, a modest effort by comparison with other consolidations, was enacted in 1974; the first large-scale consolidation in education was initiated with the Vocational Education Amendments of 1977. In the early 1970s, the Nixon Administration offered several educational revenue-sharing proposals that involved wholesale consolidation of elementary and secondary programs. These proposals were strongly opposed by some educational interest groups, and while they helped to focus attention on the issue of administrative reform, they were never an important factor in Congressional decisions.

Movement toward consolidation is basically a response to the administrative problems that followed the accumulation of small categorical programs after the mid-1960s. The issue of consolidation and administrative reform is now firmly established on the federal policy agenda and it will undoubtedly persist as an issue of fluctuating importance while categorical programs endure.[2]

Consolidation has a multitude of political and administrative purposes, meanings, and effects. Consequently, it helps to start with an "ideal type"—a simple set of propositions about what consolidation is intended to accomplish—and gradually introduce successive levels of complexity. This chapter begins with a general discussion of the objectives of consolidation; reviews some of the accompanying organizational complexities; and then analyzes the extent to which Title IV operates as a consolidated program. The final section of the chapter begins to assess the lessons of Title IV for other proposed education program consolidations.

CONSOLIDATION IN THEORY AND PRACTICE

Theoretical Objectives of Consolidation

The shift from categorical to consolidated programs involves a change in both

[1]Advisory Commission on Intergovernmental Relations, *Block Grants: A Comparative Analysis*, Washington, D.C., October 1977, p. 3.

[2]For example, one of the proposals that federal policymakers are presently considering is the Domenici-Bellmon bill, which would mandate a broad-based consolidation of education programs. Under its provisions, all federal programs serving a specific target population would be included in a single program category. In other words, all programs for the disadvantaged would be consolidated, as would

the nature of programmatic authority and in the locus of decisionmaking. One way of characterizing these changes is to say that consolidated programs are *decategorized* and *decentralized:* Distinctions among categorical programs are removed and the power to decide how program funds are spent devolves from the federal to the state and local levels.[3] The underlying rationale for consolidation is both practical and ideological. Pragmatists assume that increased flexibility and delegated decisionmaking enhance program performance by devolutions of decisionmaking to state and local officials. The result, in this view, will be programs that are more relevant to the needs and priorities of particular areas. On ideological grounds, proponents of consolidation argue that it puts decisionmaking power where it ought to be—in the hands of those most directly affected by program implementation.[4] The extent to which consolidation actually produces these effects is, of course, an empirical question and not a foregone conclusion.

The broad theoretical objectives of consolidation may be stated as:

- *Simplification of Administrative Procedures.* As the number of federal categorical programs increased, so too did the attendant paperwork at the state and local levels. Proponents see consolidation as a way to reduce the administrative load that stems from planning and proposal requirements, periodic reports, program audit requests, and the other procedural requirements of federal programs.
- *Coordination and Flexibility.* Categorical programs, supporters of consolidation argue, constrain the ability of state and local administrators to respond to their particular needs or problems. Combining separate legislative authorizations into a single, broad-based program permits state and local decisionmakers to develop programs that match their needs and to coordinate activities addressed by the multiple purposes consolidated in the program.
- *Delegation of Decisionmaking Authority.* With administrative simplification and increased flexibility comes more programmatic authority at the state and local levels. Consolidation does not mean abandoning all federal aims, but it does imply that the federal interest is expressed broadly and generally and that discretion to determine program content is granted to state and local administrators.

All of these objectives are matters of degree; the success of consolidation is not measured in absolute terms but by the degree of additional simplification, coordination, flexibility, and autonomy it introduces. In this sense, the boundary between categorical and consolidated programs is blurred. Consolidated programs still express federal policy interest. Federal program administrators still regard them-

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programs for handicapped students, non-English-speaking students, and programs for vocational education and innovation.

[3]William Mirengoff and Lester Rindler, *The Comprehensive Employment Training Act,* National Academy of Sciences, Washington, D.C., 1970, p. 4.

[4]Ibid.

selves as custodians of the federal interest and they still exercise some degree of influence over state and local decisions.

It is often difficult to judge the success of consolidated programs because there is no clear division of labor among federal, state, and local governmental agencies. We cannot say clearly that certain functions are "appropriate" to one level of government or another. Students of federalism argue that "old style federalism, emphasizing a constitutional division of authority . . . between a national and state governments," is no longer an accurate portrayal. "New style federalism" stresses "the actual interdependence and sharing of functions between Washington and the states . . . focusing on the mutual leverage that each level is able to exert on the other."[5] In education, local school systems clearly play the key role in the delivery of services. But when one asks how the content of local educational programs is determined, any explanation necessarily involves a description of shared powers and mutual leverage among local, state, and federal agencies. These relationships are not stable, as the movement from categorical to consolidated programs demonstrates. The changing relationships among levels of government has increasingly become an administrative problem, rather than a legal or constitutional problem. "The essential, but often overlooked fact about today's cooperative federalism is that it revolves around cooperation in running programs—in doing things—rather than merely in passing statutes."[6]

This means that while we can state the theoretical objectives of consolidation, we cannot measure the performance of Title IV against an absolute standard of the "correct" division of functions among federal, state, and local administrators. We can describe how much Title IV has actually decreased administrative burdens and increased coordination, flexibility and autonomy, but gauging the success of Title IV is as much a political as a technical problem. Title IV is one small part of the fluctuating pattern of relationships among federal, state, and local educational agencies. Understanding how—and how well—Title IV works requires a detailed understanding of the political setting in which it is conceived and implemented.

The Politics of Consolidation

Probably the most important fact about consolidation is that it runs counter to the political conventions of federal education policy. Central planning has little to do with the structure of federal programs, which is largely determined by bargaining among interest groups, agency representatives, and Congressional committees. The enormous increase in categorical programs as a result of Great Society legislation reflected the increasing sophistication of constituencies in pressing for specific recognition by the federal government. The mark of a successful interest group is its ability to persuade the Congress and the Administration to acknowledge its special claim for federal support. Consolidation undermines interest group politics by lumping together programs with different constituencies, and by dispersing control over the allocation of funds from the centralized federal arena to many state and local arenas. Politically, a decisive factor in successful consolidation is the

[5]Michael D. Reagan, *The New Federalism*, Oxford University Press, New York, 1972, p. 3.
[6]Ibid., p. 22.

consistency of interests among program constituencies. Where the constituencies of consolidated programs are relatively homogeneous, consolidation does not disrupt established patterns of federal support. But where constituencies are diverse and their interests essentially competitive, as in the case of Title IV, consolidation can disrupt established patterns.

Generally, support for consolidation comes mainly from the so-called "general government" constituencies—governors, mayors, state legislators, and associations of municipal governments—who were the decisive forces supporting general revenue-sharing and manpower, community development, and social services consolidations.[7] In education, support for consolidation comes from analogous general constituencies—school boards and chief state school officers. The objectives of consolidation make sense for these groups; they stand to gain the most from smaller administrative burdens and greater flexibility and autonomy.

On the other hand, groups representing specific interests such as handicapped students or school librarians oppose consolidation because it lowers the visibility of their particular program component and forces them to compete with other constituencies. For example, under Title IV guidance counselors find themselves in competition with school librarians and the two groups must argue their respective cases before local district administrators, who may be inclined to use program funds for even broader purposes.

The viability of consolidation depends not only on how well it accomplishes its broad objectives (simplification, flexibility, autonomy), but also on how successful it is in adapting to the political pressures that accompany group politics. Broad schemes of governmental reorganization often make sense in the abstract, but lose momentum when they run afoul of political pressures during implementation. "The calculus of reorganization is essentially the calculus of politics itself."[8] The organizational response of state educational agencies and local school districts to consolidation cannot be fully understood in isolation from the political consequences for constituency groups. State and local adaptations of the federal mandate are largely a product of immediate factors in their political environment.

TITLE IV CONSOLIDATION AT THE FEDERAL LEVEL

Legislative History of Title IV

Legislation sets boundaries on the implementation process, not simply by statutory language but also by informal mechanisms—debate, committee reports, and backstage politics. The practitioners' actions are shaped by their reading of Congressional intent; but intent is not a simple concept. To say that it was the desire of Congress to "consolidate" certain education programs under Title IV vastly oversimplifies Congressional intent. In fact, a careful analysis of Title IV's legislative history reveals as much ambivalence and opposition toward consolidation as

[7]See, for example, Advisory Commission on Intergovernmental Relations.
[8]Joseph Pechman (ed.), *The 1978 Budget: Setting National Priorities*, The Brookings Institution, Washington, D.C., 1977, p. 406.

support for it. Many of the apparent difficulties accompanying Title IV's implementation can be traced directly to its legislative history.

The Nixon Administration initiated the debate on consolidation of education programs with two proposals: the Education Revenue Sharing Act of 1971 and the Better Schools Act of 1973. Both proposals included wholesale consolidation of elementary and secondary programs and both were opposed by most educational interest groups. The Administration's rationale for consolidation centered on reducing administrative burdens and increasing the autonomy of states and school districts. Interest groups opposed these proposals not only because such a consolidation attacked the structure of existing categorical programs but also because the groups believed that consolidation was being used as an excuse to reduce federal educational expenditures.

While the Nixon Administration proposals found little acceptance, state and local educational administrators supported the general idea of consolidation. In hearings on the Elementary and Secondary Education Amendments of 1974, Senate and House committees heard testimony from administrators about the burden of federal paperwork that accompanies categorical programs. Congressman Albert Quie of Minnesota was a major spokesman for consolidation and sponsor of the proposal that eventually became Title IV. His proposal was seen as a moderate compromise—a way of responding to complaints about the burden of federal paperwork without the threat of wholesale consolidation. The proposal contained two parts. In the first part, support for libraries, materials, and guidance was consolidated from Titles II and III of ESEA and Title III of NDEA; in the second part, support for innovation, dropout prevention, health and nutrition, and strengthening state agencies was consolidated from Titles III and V, and Sections 807 and 808 of ESEA. This became the House version.

In the Senate, there was considerably less support for consolidation. The Senate committee nonetheless proposed a weak substitute for the House version. In the Senate proposal, all federally administered state grant programs would be put into a single state plan (Titles I, II, III of ESEA; Title III, NDEA; Adult Education and Vocational Education). Only the drafting of the state plan, not the administration of the programs, was consolidated. The Senate version also created a new consolidated state grant program out of Titles II, III, and V of ESEA, and Titles III and V of NDEA. Accompanying the Senate's consolidation proposal was an interesting *quid pro quo:* a Special Projects Act that created seven categorical programs (metric education, gifted and talented, community schools, career education, consumers' education, women's educational equity, and arts education). In two of these areas (gifted and talented and career education), the U.S. Commissioner of Education was required to establish offices reporting directly to him.

A critical element in Congress's decision to proceed with consolidation was a threat by the Nixon Administration to veto the Education Amendments of 1974 unless they included a consolidation provision. Frank Carlucci, Under Secretary of HEW and the Administration's chief spokesman on the education amendments, told Senate and House conferees that the Administration could not accept a bill without consolidation. A major education lobbyist said, "There was a horse trade. We had already gotten an expansion of Impact Aid. Title IV was the one thing that Cap Weinberger (the Secretary of HEW) really wanted, so he could go back down-

town and tell the White House that he had convinced Congress to try consolidation. We were more than happy to give it to him."

The compromise struck between members of the House and Senate in conference committee contained the House's consolidation proposal and the Senate's Special Projects Act. Seven programs were consolidated, and seven new categorical programs authorized. This "seven-steps-forward-seven-steps-back" approach communicates a great deal about Congress' ambivalence toward consolidation. Title IV was a concession to complaints about the burden of federal paperwork, but politically, categorical programs still had appeal.

Congressional ambivalence was also demonstrated by the language used in House and Senate committee reports to describe the purpose of Title IV. The Senate argued that "successful categorical programs should not be abandoned simply because of their accumulated attendant paperwork," and added that its proposal was "an attempt to achieve some measure of consolidation without obliterating all program identity and jeopardizing past successes."[9] The House called attention to the fact that its consolidation was "conditional"—it would not take effect unless the aggregate appropriation for Title IV equalled the previous appropriation for all the consolidated programs—and warned the Administration that "consolidation ... must not be used to retrench the Federal commitment on aid to education."[10] The House also said that "the adoption of consolidations for these programs in no way implies a belief that the programs have not been successful.... They have been successful, but we believe that their objectives can be continued ... under a simpler administrative structure."[11] For both the House and Senate, the essential rationale for consolidation was administrative simplification, but they were careful to stipulate that simplification was not to be accomplished by reducing either federal expenditures or attention to the educational needs served by the categorical programs.

In choosing programs to be consolidated under Title IV, Congress followed political rather than administrative logic. All the Title IV programs had either relatively weak constituencies or were not regarded as major programs by strong constituencies. Legislative staff and interest group representatives were unanimous in the opinion that programs were chosen to minimize political repercussions rather than to maximize administrative feasibility. Indeed, the hodgepodge of constituencies aggregated around the Title IV consolidation virtually guaranteed that the program's implementation would be characterized by fierce competition. In Part B, librarians, guidance counselors, and media specialists—each a relatively strong constituency in its specialized domain—would now compete for a common pot of funds. In Part C, two programs with very weak constituencies (dropout prevention and nutrition and health) were combined with two programs (strengthening state agencies and innovation) that had relatively strong (though politically diffuse) state and local followings.

None of the groups whose programs were consolidated initially favored the idea. As one veteran legislative analyst put it, "Most congressmen and lobbyists see the reasoning behind consolidation, they just don't want their programs consolidat-

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[9]Senate Committee on Labor and Public Welfare, *Report on the Education Amendments of 1974*, March 29, pp. 61, 66.

[10]House Committee on Education and Labor, *Report on the Elementary and Secondary Amendments of 1974*, February 21, 1974, p. 26.

[11]Ibid., pp. 26-27.

ed." Library representatives said they "opposed it flat out, but we finally agreed for fear that it would affect our funding if we didn't." A guidance representative put it this way: "I got a call from [a Congressional staff member] and he said, 'Consolidation is here, take your pick of whether you'd rather be consolidated with five programs or three.' It was simple numerical logic. We chose Part B because there were fewer competitors." Both the librarians and guidance counselors felt they had been presented with a *fait accompli;* some concessions had to be made to the Nixon Administration's pressure for consolidation and they were not in a position to resist. Two major educational interest groups—the National School Boards Association and the National Education Association—supported the consolidation, largely because their immediate interests were unaffected by Title IV programs and because their constituencies generally supported administrative simplification. Not surprisingly, the groups whose programs were consolidated still feel that they were outmaneuvered by a stronger political coalition, and, while they see the political logic of the compromise, they do not accept its administrative logic. One legislative analyst captured the prevailing attitude among many observers by saying, "I suppose you could try to rationalize the particular combination of programs they chose to consolidate, but it really came down to a process of negotiation. No grouping would be adequate for these particular programs, so you just have to put them together in a way that causes the least harm."

Congress expressed its ambivalence toward consolidation in other ways, too. A number of people who helped develop Title IV maintain that the program was designed to make implementation difficult and to dampen enthusiasm for future consolidations. They point not only to the political cross-pressures created by combining diverse constituencies into a single program, but also to specific provisions in the law (e.g., the phase-in year, which provided that half of the first year's funds were to be administered under the old categorical legislation and half under the new consolidated legislation). When a participant in early planning of the Title IV legislation was asked to comment on USOE's difficulties in administering this split-year phase-in strategy, the reply was, "Did it ever occur to you that it might have been planned that way?" Asked to expand, this observer said flatly: "Title IV is not designed to work. The phase-in provision was administratively impossible and most everyone knew it. . . ."

Congressional ambiguity also stems from other legislative actions that seem inconsistent with the intent of this consolidated program. At the same time that Title IV was authorized, Congress created an Office of Libraries and Learning Resources (OLLR) in USOE, "through which the Commissioner shall administer all programs in the Office of Education related to . . . libraries and information centers and educational technology." Two years later, in the Education Amendments of 1976, Congress authorized an administrative unit in USOE to coordinate all guidance and counseling programs in and out of the federal government. Thus, on the one hand, Congress said that guidance and library programs should be consolidated as a single state grant program—Title IV-B. On the other hand, it established two separate administrative units within USOE to oversee these two functions. If consolidation means locating full management responsibility for the two functions in

a single administrative unit, then it is clearly impossible for USOE to comply with both expressions of Congressional intent simultaneously.[12]

On the essential issues of consolidation, then, Congress was ambivalent and equivocal. On certain other issues, however, Congress was more direct. From the first, it was clear that Congress's major concern was the distribution of funds. The original Senate report, for example, criticized the "continuing inability of the Office of Education to provide fiscal data concerning local distribution of funds under State plan programs."[13] In a HEW appropriations debate, the issue arose in a more specific form. The appropriations conference report said, "The conferees are concerned that school library assistance is not being directed toward schools with the greatest need," and required that a study of the issue be submitted prior to the 1979 budget. This concern for the distribution of funds is essentially independent of the administrative delivery system; the same questions could have been asked—and in fact were asked—of categorical programs. Congress makes it clear that the distribution of funds among competing constituencies are at least as important as substantive issues of consolidation.

Congressional posture toward consolidation was once again confirmed in the Education Amendments of 1978, which reauthorized Title IV. This legislation modified the program in several important ways: A single state plan for all Title IV activities is now optional; a single application and filing date is no longer required for IV-B and IV-C funding; and guidance and counseling are now separated from Part B and placed in a new Part D. These changes resulted from testimony and lobbying by program constituents. State administrators felt that without real administrative consolidation at the federal level, the single state plan and funding application were meaningless. Guidance and counseling representatives argued that they were unable to compete in local funding decisions between "people and things"; local administrators, they argued, prefer to make short-term commitments for media and instructional materials rather than long-term commitments for guidance personnel. These changes make sense based on the operational logic of the program, but they further undermine the already shaky Title IV consolidation.

The politics of consolidation add an important dimension to the theoretical model of consolidation. Consolidation is more likely to work when it responds to interest group politics and more likely to run into serious problems when it does not. The Title IV consolidation was a political expediency—a short-term response to pressure for administrative simplification. The broad, theoretical purposes of consolidation—simplification, coordination, and delegated authority—are clearly subordinate to other, more immediate concerns such as the distribution of funds and the competitive position of program constituencies. These are facts of life for Title IV. They are part of the program's history and have produced far-reaching effects on its operations.

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[12]It is important to note that the General Counsel's Office (OGC) has not been asked to determine whether IV-B is a *library* program. In lieu of an OGC ruling that IV-B is a library program, IV-B could have been placed in a number of other USOE units. The former director of IV-B initiated the placement of IV-B in OLLR, feeling that it made more sense there given the IV-B staff's background in ESEA Title II.

[13]Senate Committee on Labor and Public Welfare, *Report on the Education Amendments of 1974*, March 29, 1974, p. 62.

USOE Administration of Title IV

USOE's implementation of Title IV began in the fall of 1974 with the appointment of a steering committee composed of representatives from the original categorical programs. The Deputy Commissioner of USOE had general responsibility for most of the programs included in the consolidation. He convened the committee and designated an Associate Commissioner as its coordinator. Other members included the Directors of ESEA Titles II, III, V, and NDEA III. This steering committee served as the focal point for about a dozen task forces that were staffed by people drawn from the various categorical programs. Their responsibility was to develop specific guidelines and procedures for the new program. The task forces focused on such issues as regulations, state plan format, evaluation, and dissemination. Between the fall of 1974 and the spring of 1975, the committee worked out program details and organizational arrangements.

Describing the work of the committee, one of its participants observed, "it was conducted as a democratic process," meaning that there was no clear assertion of control by the upper levels of USOE. Other participants viewed the committee as an arena for behind-the-scenes conflict. A significant part of the committee's work was focused on arbitrating disputes among representatives of categorical interests. Sometimes the disputes were open, sometimes concealed. But, in the words of one member, "the categorical interests were still shining through."

Early in the planning process, a critical decision was made that has had far-reaching consequences for program operation. USOE was confronted not only with the implementation of Title IV but also with the establishment of the Congressionally mandated Office of Libraries and Learning Resources. The OLLR authorization made it clear that the Office was to have responsibility for all federal library programs, but the Title IV consolidation implied that the Title II library program was to become part of a larger consolidated program that included guidance and counseling. The solution to this seeming contradiction, which was approved by the Deputy Commissioner, was to split Parts B and C of Title IV into completely separate organizational entities and give the responsibility for each to an administrator with the rank of Associate Commissioner. This decision produced what we will call a two-track administrative structure. Currently, the Part B program resides with an Associate Commissioner who is Director of OLLR, while the Part C program resides with the Associate Commissioner for State and Local Educational Programs (SLEP).

The major flaw in the two-track structure, as all the major participants readily admit, is that no one has direct administrative authority over Parts B and C. Two Associate Commissioners share the administrative responsibility for Title IV. Although both report to the same Deputy Commissioner, no single authority exists at the operational level. In other words, there is no administrative consolidation of Title IV at the federal level. The program staffs of Parts B and C each report to a different administrator; coordination between the two parts requires negotiating formal boundaries that extend to the Associate Commissioner level.

There is no clear explanation for why this happened. The majority of the participants believe a major reason is that the Congressional mandate for OLLR conflicted with the consolidation objective. As one legislative staff member said, "No matter what they [USOE administrators] try to do to the organizational struc-

ture of the program, they've got OLLR sticking up like an iceberg in the middle of the thing." But a number of participants in the early planning for Title IV felt that the two-track structure was not necessarily inevitable. One participant explained it this way:

> Congress said, "There shall be a consolidation." They used words like "simplification" and they required a single application and plan. This would seem to indicate that they wanted the whole thing administered by a single unit. But we didn't do it that way.

The sentiment for a single administrative unit is considerably stronger among Part C staff than among Part B staff. One Part C staff member said, "If we had our druthers, the best system would be a staff of generalists for both programs under a single unit, but we'd never get away with it because there is tremendous constituency pressure to keep Part B separate." A member of one of the Part B interest groups seconded this observation by saying, "For God's sake don't throw us all into the same pot. There's too much competition for resources as it is." One Part C staff member went so far as to say:

> Parts B and C must be put together, and I'm willing to see that happen even if it means giving up Part C—we had a responsibility to create a new delivery system, to improve the management of the programs. We didn't do it at the federal level, and our failure has had ripple effects at the state and local levels.

While virtually no one is completely happy with the two-track structure, any attempts to merge Parts B and C under a single unit would reopen the issue of Congressional intent in establishing OLLR and generate opposition from Part B interest groups. The structure continues to exist, not because it is a sensible administrative solution to consolidation, but simply because strong vested interests oppose any change.

It is clear that Parts B and C staff have taken their broader responsibilities under the consolidated program quite seriously. For example, the director of Part B invested considerable effort in promoting programs that include guidance as well as instructional materials. Part C staff are in frequent contact with Bureau of the Education for the Handicapped staff in an effort to deal responsibly with this program component. It is also clear that the common perception within and outside of USOE is that Parts B and C have been "captured" by previous Title II and Title V program personnel. This perception is reinforced because, despite several requests, Part B has never been granted any staff with guidance and counseling expertise. In addition, Part C still relies heavily on personnel whose previous experience has been exclusively with state educational agencies. All of this adds to the general impression that there has been no administrative consolidation in USOE and that the organizational structure is simply a slight modification of the former categorical structure.

These staffing differences reflect the essentially arbitrary way in which responsibilities were originally assigned: Parts B and C were assigned to different Associate Commissioners and then Title II staff were assigned to Part B and Title V staff to Part C. If there was a systematic attempt at higher levels within USOE to think about such basic problems as differences in workloads between the two staffs, there

is no record of it. Title IV simply continues to run on the two-track structure, with little or no regard for the odd administrative anomalies it has produced. The coordinating mechanisms are only procedural constructs and, in the words of one staff member, "the spirit of working together is a forced one."

The federal organizational structure of Title IV mirrors the confusing signals given by Congress when it passed the legislation. On the one hand, Congress sent strong categorical signals by mandating OLLR and the guidance and counseling unit. But on the other hand, it sent signals that, some USOE administrators believe, endorse a completely consolidated administrative structure, staffed by generalists who assume responsibility for both Parts B and C. The resolution of these two contradictory signals is, not surprisingly, an administrative structure that is neither categorical nor consolidated. The two-track structure sufficiently separates the interests of competing constituencies for each to still claim some special attention. The two-track system does *not* clarify administrative responsibility or integrate substantive program objectives. Consequently, some who argue that the intent of Title IV was to consolidate and streamline the management of federal programs, criticize USOE for failing to meet this objective. USOE has consolidated Title IV program operations neither structurally, administratively, nor substantively.

TITLE IV CONSOLIDATION AT THE STATE AND LOCAL LEVELS

Consolidation is predicated on the assumption that collapsing various categorical programs into a single one will simplify administrative procedures and increase state and local discretion. Another expected result is greater flexibility in responding to particular state and local needs. Consolidation proponents also argue that bringing categorical staff together will enhance the overall quality of agency services.

One expected outcome of consolidation—diversity in state and local program choices—depends primarily on the loosening of categorical strings. With categorical guidelines removed (as is the case with Sections 808 and 807 health and nutrition and dropout prevention grants) or blurred (as is the case with Part B's eligible purposes), it is expected that state and local agencies will be free to modify former allocation patterns in light of state and local needs. As discussed in Chap. 2, state and local Title IV programs do show a range of objectives and management strategies. Staff have moved away from former categorical allocation patterns and have used the increased discretion afforded by Title IV to address particular state and local concerns.

Other consolidation outcomes—administrative simplification, increased responsiveness, and flexibility—depend on the organizational and programmatic responses of state and local agencies as well as federal policies and regulations. A consolidated strategy assumes that implementing agencies will institute procedures to promote coordination and cooperation among staff responsible for component program objectives. In theory, such structural changes are expected to enhance the ability of program staff to respond to priority interests and to provide effective assistance, as well as reduce administrative detail. Simply put, a policy of

consolidation assumes that the whole is greater than the sum of its parts—that bringing together program staff and their particular concerns will enhance the overall capacity of the implementing agency. This section examines state and local response to consolidation and the extent to which Title IV has met the broad objectives of a consolidated strategy.

State-Level Consolidation

State-level consolidation assumes changes in organizational routines to coordinate the activities of former categorical program staff. Although most states (70 percent) retained a separate staff for Parts B and C of Title IV, almost all states took one or more steps to consolidate the program administratively. Most frequently, a Title IV director was appointed (72 percent). This appointment was usually made in one of three ways. Some states added the responsibilities of the Title IV program director to those of the Part C director. Other states added responsibility for directing the Title IV program to the other responsibilities of the state's Federal Programs Manager. A third strategy was the appointment of someone from elsewhere in the SEA to the position of Title IV Director. Given these different strategies, it is not surprising that the position of Title IV director generally is a part-time role. Only about one-third of the Title IV directors report spending all of their time on Title IV activities.

A number of states took other steps, often in addition to the appointment of a Title IV director, to manage the consolidated program: 31 percent of the states established a coordinating council or committee, and 48 percent consolidated program staff into one office.

In short, most SEAs went somewhat further than USOE in initiating new administrative arrangements to implement Title IV. In purely structural terms, then, the states generally achieved consolidation of the former categorical efforts into a Title IV program.

Although structural modifications may be a necessary first step in implementing a consolidated policy, they are not sufficient to meet the broad goals of consolidation. Just as a parent participation strategy does not ensure parental involvement in school affairs, neither does the establishment of organizational mechanisms to promote staff coordination and cooperation guarantee that it will take place. In fact, the administrative consolidation of Title IV did little to promote state-level coordination and cooperation.

We used two composite measures to assess state-level coordination and the extent of cooperation between Part B and Part C staff. The first measure, extent of state-level B-C coordination, is a composite of the Title IV, IV-B, and IV-C directors' assessments of the extent to which Part B and Part C programs are coordinated at the state-level.[14]

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[14]Because the study was partly designed to measure perceptual differences across various Title IV administrative levels, questionnaires addressed to each respondent type contained a number of parallel questions. In many cases respondent answers from the same level (i.e., state or local district) did not differ significantly from each other. If this was the case across the entire sample, a composite variable was created by taking the average of the two or more item responses.

In other cases, responses to two or more items thought to be tapping a single underlying dimension (e.g., staff competence) were sufficiently parallel to warrant their combination in a similar manner. In

This measure primarily taps *procedural* coordination such as joint staff meetings, document preparation, lines of authority, and the like. The second measure, overall level of B-C staff cooperation, is a composite variable measuring the level of cooperation between Part B and Part C staff on a number of specific tasks related to Title IV paperwork, administration, and technical assistance. In contrast to the procedural coordination measured by extent of coordination, level of cooperation assesses the extent to which program staff actually work together to implement various aspects of the Title IV program.

States vary widely in the level of SEA coordination and in the extent of IV-B and IV-C staff cooperation. However, the *overall* level of state coordination and cooperation is much lower than would be expected in a successful consolidated program effort. Only about one third of SEA respondents report a high level of procedural coordination between the IV-B and IV-C programs; cooperation among staff members is high only on necessary paperwork matters—preparing the single application, the annual program plans, and program guidelines. However, our fieldwork suggests that cooperation on paperwork tasks usually means little more than meeting agreed-upon deadlines for the submission of separately prepared parts of the annual program plan or the single application. *Substantive* integration of the type assumed by a consolidated policy appears only in staff cooperation on program administrative tasks such as program monitoring and review, and in program development and assistance efforts such as dissemination and provision of technical assistance. In these areas, approximately half of the respondents report that only "a little" takes place, or that none was ever attempted. The high level of *structural consolidation* observed at the state-level, then, is not accompanied by a correspondingly high level of *administrative coordination* or *programmatic cooperation*. To this point, the bivariate correlation between the extent of state-level coordination and the presence of either a coordinating council, a Title IV Director, or a consolidated staff is low (.10); there is no correlation between these organizational changes and the level of cooperation between Part B and Part C staff (−.01).

It is possible, however, that state-level structural choices do affect the level of coordination and cooperation once other factors are taken into account. To explore the relationship between state-level coordination and cooperation between staff and other variables, we used multiple regression analysis. In addition to choices about administrative structure, we examined the effect of USOE staff activities, State Advisory Council influence, amount of state Title IV grant, and state-level coordination between Title IV and other state and federal programs.

The results of these analyses are presented in Table 3.1. As expected, state-level Title IV administrative arrangements have no effect on either the extent of administrative coordination or on the level of staff cooperation. Simply reorganizing program staff or initiating new staff arrangements does not influence the *process* of implementing the consolidated Title IV program. In the case of Title IV, it appears that even after a modification in organizational structure, staff function essentially as they did under the former categorical programs. To this point, one

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both cases, the test used for assessing the statistical reliability of such combinations was Cronbach's alpha, for which a cut-off of .6 was used.

These procedures allowed us to deal parsimoniously with a large number of similar questions, both within and across questionnaires.

Table 3.1

DETERMINANTS OF STATE-LEVEL COORDINATION AND COOPERATION

Determinant	Standardized Regression Coefficient: Extent of State-Level B-C Coordination	Standardized Regression Coefficient: Overall Level of B-C Staff Cooperation
Total Title IV grant	-.32**	-.33**
Separate staff[a]	-.22	---
Coordinating council, Title IV Director, or staff consolidation	-.00	-.09
Coordination of Part C with other state and federal programs	-.03	.50**
Coordination of Part B with other state programs	.13	.03
SAC impact	.25	.17
USOE effectiveness	.07	-.12
State-level B-C coordination	---	.30*
Reduction in staff as a result of Title IV	-.13	-.43**
R^2	.32	.74
N	32	20

[a]The sample size for the second equation is smaller than that for the first because questions about the level of B-C staff cooperation were asked only of respondents who reported separate staff responsibilities for IV-B and IV-C. However, statistical tests indicated that this sample does not differ significantly from the state sample as a whole on a number of critical factors (e.g., SEA size, amount of Title IV grant). The only significant differences are for SAC impact and coordination of Part B with other state programs--variables that do not contribute significantly to the explained variance.

*Significant at the .10 level.

**Significant at .05 level.

***Significant at .01 level.

Part C director, a former Title III director, said, "The consolidated program just put a 'IV' over what I was doing before. Nothing changed."

Neither did State Advisory Council (SAC) impact (i.e., influence over determination of the IV-B formula, development of IV-C program priorities) affect the level of state program coordination or cooperation. Similarly, states rating USOE program staff as "very effective" in a number of program areas—interpretation of guidelines, conduct of national workshops, annual program plan negotiations—were no more or less likely to report a high level of coordination and cooperation.

Our fieldwork suggests that an important reason why SACs and USOE staff have little influence on SEA Title IV staff coordination and cooperation is that substantive consolidation of IV-B and IV-C efforts is not a priority or even an area of concern in most cases. Few if any SACs address Title IV as a consolidated effort; instead, most SACs direct their concerns and advice to IV-B and IV-C as discrete programs. USOE program staff concerns about consolidation, as expressed in on-site reviews, relate to the structural arrangements established to administer the Title IV program.

One SEA visited in the course of our fieldwork, for example, appointed a Title IV director only at the insistence of USOE staff. SEA program staff did not feel that the appointment of a director was important to program operations. And, in fact, the state program continues to operate essentially as it did before the new position was added.

However, a number of SEA program staff believe that USOE staff have influenced the level of state-level coordination and cooperation through "omission." Both survey respondents and program staff interviewed during fieldwork suggested that the absence of significant federal-level consolidation of IV-B and IV-C

activities shaped the response of their state to the Title IV program. As one SEA Title IV director put it, "Consolidation of USOE [Title IV] administration would encourage consolidation at the state-level." Many SEA respondents cited increased federal consolidation as a change they would suggest to improve the leadership and services provided by USOE: "USOE staff seems to be operating on a separate program basis"; "Reorganization with one line of authority for *all* Title IV-B and IV-C staff would speed up responses, add to consistency, and strengthen programs"; "Perhaps if Title IV-B and IV-C staff would communicate with each other more frequently"; "Fragmented former categorical personnel at USOE are still pulling in opposite directions."

The single factor significantly influencing both the extent of state-level coordination and the level of cooperation between Part B and Part C staff is the size of the total Title IV grant. States receiving the largest Title IV grants are less likely to report a high level of substantive consolidation. Title IV grant size is directly proportional to the size of an SEA and Title IV program staff. Thus, staff in larger states oversee larger IV-B and IV-C program efforts. In the absence of guidelines to promote substantive integration of the former categorical efforts or a predisposition on the part of state staff to increase coordination and cooperation, large states are most likely to continue categorical "fiefdoms," consolidating staff only on paper.

Although total Title IV grant size is the only factor significantly affecting the extent of state-level administrative coordination, the level of cooperation among program staff is influenced by other factors. Of particular interest is the positive influence of state propensity to coordinate Part C programs with other state and federal program activities. Federal Title IV regulations do not address the issue of *inter*program coordination. Coordination among various state-level activities reflects independent state-level initiative and represents a state "point of view" about the management and implementation of special program efforts. A number of states have implemented procedures, such as SEA-wide coordinating councils, to reduce the fragmentation of special program efforts and to promote an integrated state-level approach to state priorities and objectives. For example, in one state, categorical programs are coordinated in a state-level effort to improve basic skills. All programs administered by the state, such as Title I, Title IV, and state bilingual and compensatory programs, are reviewed with an eye to their joint effect on improving basic skills.

Some SEA staff view the opportunities inherent in the IV-C program as particularly important in areas characterized by an underdeveloped educational technology, specifically compensatory education and career education. In combination with a IV-C strategy of development grants, mini or adoption grants, and the National Diffusion Network (NDN), IV-C staff in some states have used the IV-C program to develop and install successful practices; IV-C program efforts are coordinated with federal career education and Title I compensatory education programs as well as state-funded efforts in these areas.[15]

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[15]State-level coordination of IV-B activities with other state programs does not similarly serve as a proxy for general state management style because in a number of states, coordination of IV-B with other program efforts represents a more narrowly defined subject area—viz., library and media services. Thus, though the bivariate correlation between coordination of IV-B with other programs is high enough to suggest a positive association (.34), they do not always represent a similar management point of view.

It is not unexpected that SEAs attempting to promote coordination across state efforts would also encourage cooperation between IV-B and IV-C staff. In this instance, the level of Title IV program cooperation reflects a general state predisposition and management style.

Similarly, where this predisposition exists, administrative coordination of IV-B and IV-C programs serves to promote a higher level of overall staff cooperation. Furthermore, our fieldwork suggests that *administrative coordination* contributes to *staff cooperation* only in the presence of a general inclination to coordinate state-level program efforts. In the absence of this overarching state management perspective, it appears that administrative coordination, like Title IV "consolidated" staffing arrangements, has only a nominal effect on actual program implementation and cooperation among staff members.

It is important to note that the level of coordination between IV-C and other state and program efforts is *not* strongly associated with particular kinds of SEAs. There are low bivariate correlations between a strategy of coordinating IV-C with other program efforts and other state characteristics such as SEA staff size (−.03), number of school districts served by the state (−.15), and total Title IV grant (−.11). The management perspective represented by a high level of coordination between IV-C and other state and federal programs is essentially independent of state characteristics.

A final factor contributing to a high level of cooperation between IV-B and IV-C staff is whether or not Title IV staff was reduced overall as a result of Title IV. In about one-fourth of the states, Title IV directors report that staff size was reduced as a result of the new Title IV program. Staff in these states were less likely to cooperate on program activities. From one perspective, coordination can be seen as a constructive response to staff reduction. However, SEA officials apparently felt that the increased responsibilities assumed by remaining staff made it difficult to spend time and energy to develop a new management strategy to promote coordination. The apparent result of reductions in Title IV program staff was solidification of categorical boundaries.

In summary, the overall extent of coordination and level of cooperation between Parts B and C of Title IV is low. Where it does exist, it is influenced neither by new structural arrangements nor by USOE program activities. Both cooperation and coordination are influenced by overall grant size: the larger is the Title IV grant, the less likely is coordination and cooperation. The level of staff cooperation —the expected substantive outcome of a consolidated program—is strongly influenced by the general state management perspective and predisposition to overall coordination of program efforts.

State-Level Effects of Program Consolidation

Respondents assessed the effect of Title IV on a number of expected outcomes such as flexibility, ability to address state and local priorities, and program paperwork. In general, and not surprisingly, the Title IV program appears to have had little effect on the policy outcomes assumed by a policy of consolidation. Most

people responded that things "stayed the same" as a result of Title IV. Overall, Title IV has not improved the amount of program paperwork, planning flexibility, the ability to address state and local priorities, or the quality of SEA services. However, the generally low level of coordination and cooperation reported at the state-level means that Title IV, as a consolidated program effort, was not implemented. Program effects, in this case, would not be expected.

Regression analyses (see Tables 3.2 and 3.3) also show weak Title IV program effects on consolidated policy outcomes. However, it is important to note that the survey measures assess the *change in particular policy effects resulting from Title IV*. That is, how did the Title IV program influence these policy outcomes as compared with the previous categorical programs? Thus, it is likely that the effects of staff coordination and cooperation, even where they exist, will not appear as Title IV program effects. As discussed previously, level of SEA staff cooperation is influenced by the presence of state efforts to coordinate IV-C with other state and federal programs. This variable, we argued, is a proxy for a general state management style or point of view about the management of special project efforts. It is likely that such a state management perspective predates the Title IV program--that the former categorical programs were also managed with an eye to coordination and cooperation, and so to programmatic flexibility and responsiveness. The initiation of Title IV, then, would not represent a *change* in such states and staff would be expected to note that things had "stayed the same" as a result of Title IV.

Of interest in the regression models, however, is the strong and consistent effect of increased SEA staff contact with school districts. The Title IV legislation contains clear expression of Congressional intent to increase the number of districts participating in the Title IV program, as well as the types of districts involved in innovative project efforts. Thus, *as a result of Title IV,* many SEAs have increased their letters, telephone calls, and staff visits to school districts. Though independent of Title IV's consolidated approach to project management, this change in SEA staff activities has promoted the expected outcomes of a consolidated policy.[16] Increased district contact provides SEA staff with important information about the adequacy and relevance of SEA services, and allows state staff to keep abreast of changing local priorities and important differences across school districts. For example, few small, rural, or low-wealth districts previously competed for Title III grant funds. Increased contact with these districts under IV-C provides valuable information to state staff about the development of better strategies to address such school district differences. For example, one state IV-C director commented that use of a mini grant strategy in his state was a direct result of increased contact with small, rural districts and better knowledge on his part about how these districts would best participate in the IV-C program.

In summary, there are essentially no Title IV program effects on the expected outcomes of a consolidation policy. But this finding does not belie the assumptions underlying a consolidated program strategy. By and large, these assumptions were never tested. The new administrative arrangements prompted by Title IV have

[16]As reported in Chap. 2, some school district officials do not see increased contact with state staff so positively. Instead they sometimes feel that increased SEA contacts compromise their autonomy.

Table 3.2

Factors Affecting Title IV Policy Options, for All SEA Title IV Staff

Factor	Change in Paper Work	Ability to Address State Priorities	Quality of SEA Services as Reported by Director of			Flexibility in SEA Planning as Reported by Director of		
			Title IV	IV-B	IV-C	Title IV	IV-B	IV-C
SEA size	.33	-.37**	-.07	-.14	.46***	-.15	-.29*	.07
Administrative coordination	-.12	-.10	.05	-.00	.20	.01	-.09	.31*
Coordination of IV-C with other state and federal programs	.16	-.01	.08	.08	-.20	.24	.26*	-.01
Coordination of IV-B with other state programs	-.05	.36**	.04	.14	.01	-.02	-.02	.03
Organizational changes to implement Title IV[a]	.02	.25	.07	.10	-.18	.13	.18	-.09
SAC impact	-.45***	.03	.05	.13	.04	.24	.11	.28**
Change in level of SEA contact with school districts	.15	.22	.53***	.40**	.65***	.30*	.23	.28*
R^2	.37	.37	.40	.35	.56	.38	.34	.33
N	37	37	37	37	36	36	36	36

[a]Includes a count of SEA choices to create a coordinating council, appoint a Title IV Director, or consolidate staff.

*Significant at .10 level.

**Significant at .05 level.

***Significant at .01 level.

Table 3.3

Factors Affecting Title IV Policy Outcomes, for SEA With Separate Staff

Factor	Change in Paper Work	Ability to Address State Priorities	Quality of SEA Services as Reported by Director of			Flexibility in SEA Planning as Reported by Director of		
			Title IV	IV-B	IV-C	Title IV	IV-B	IV-C
Cooperation between IV-B and IV-C staff	-.40	.24	.76**	.25	-.21	-.01	-.30	.69*
Administrative coordination	.20	-.11	-.04	.19	.26	.27	.09	.08
Coordination of IV-C with other state and federal programs	.17	.05	-.32	.56**	.17	.31	.73**	-.19
Coordination of IV-B with other state and federal programs	-.30	.03	.01	-.45**	-.30	.20	-.19	-.49*
Organizational changes to implement Title IV[a]	-.30	.29	.12	.01	-.30	.12	.01	-.00
SAC impact	-.00	.09	.01	.03	-.00	.22	-.11	.52**
Change in level of SEA contact with school districts	.58**	.45*	.34	.41*	.58**	.36*	.40*	.19
SEA size	.27	-.01	.11	.48*	.27	-.17	-.07	.47
R^2	.48	.41	.53	.51	.48	.60	.41	.43
N	22	22	22	22	22	22	22	22

[a]Includes a count of SEA choices to create a coordinating council, appoint a Title IV Director, or consolidate staff.

*Significant at .10 level.

**Significant at .05 level.

***Significant at .01 level.

been pro forma and, in general, Title IV has not been implemented as a consolidated program effort at the state-level.

Local-Level Consolidation

State-level consolidation assumes the initiation of new organizational arrangements as well as the procedural and substantive integration of Part B and Part C staff activities. Consolidation at the local level means something different: the programmatic coordination of IV-B and IV-C activities. For example, IV-B funds could be used to purchase materials for a IV-C project, or a IV-C project could address new ways of providing library services to reluctant readers. Coordination of this type assumes no formal administrative consolidation of IV-B and IV-C, beyond agreement on collaborative project objectives and strategies.

Most school districts—around 70 percent—do *not* make an effort to coordinate IV-B and IV-C projects. Instead, most district officials continue to operate IV-B and IV-C as unrelated activities. One reason why many local officials are reluctant to coordinate IV-B and IV-C planning and project activities lies in the different nature of the programs' funding strategies. IV-B is an entitlement grant distributed by formula. IV-C is (in all states but one) a competitive grant. Local planners, consequently, cannot be assured that their IV-C project proposals will be funded, and that the IV-B materials ordered to supplement these activities will be relevant in the absence of a special project. Furthermore, IV-B applications in many states specify materials ordered for the present year, whereas IV-C proposals describe projects the district hopes to implement in the coming year. One local Federal Programs Manager summed up the frustration of many local officials in trying to coordinate IV-B and IV-C:

> [Program coordination] is the ideal method.... Unfortunately the IV-C projects begin a year after the IV-B materials arrive and there is no assurance that the IV-C implementation funds will be received due to the competition factor. Therefore, the choice of target groups and innovative ideas... is inhibited by the very funds designated to foster new and innovative programs.

A more fundamental reason why most local staff do not attempt to coordinate Part B and Part C activities is that they do not see Title IV as a "new" program effort. Instead, most view Title IV simply as a new designation for the activities they carried out under the former categorical programs. They see consolidation as a forced marriage between two substantively incompatible programs.

However, where efforts have been made to coordinate IV-B and IV-C activities, Title IV officials are uniformly positive about the merit of such an approach. Most districts that coordinated Part B and Part C used IV-B funds to provide materials for the IV-C project. However, local variation within this common strategy is striking. One district used IV-B funds to make individual teacher grants for materials to implement a IV-C gifted and talented project. Another district used IV-B funds to provide teacher materials for implementing new methods learned in a IV-C staff development workshop. Teachers in another district were requested to make their IV-B material requests supportive of a IV-C citizenship project.

Some districts also coordinated IV-B and IV-C funds to promote or expand innovative practices. One district used IV-B funds to provide teacher incentive grants aimed at acquisition of the concepts and skills developed in a local IV-C project. Another district used Part B funds to help test a district-developed innovative project for one year. The district's Federal Programs Manager reports that "this effort led to a Title IV-C proposal for an adoptive grant which was funded. Coordination efforts have worked out extremely well in our district."

Coordination of IV-B testing activities and a IV-C project is a third frequent form of local coordination. In particular, a number of districts have used IV-B test results in their IV-C needs assessment, proposal development, and evaluation.

An important finding from the perspective of federal policy implementation is that SEA Title IV staff also exert significant influence over local project activities (see Table 3.4). Contrary to the assumptions underlying many federal policies, and the private speculation of some disheartened state-level staff, an SEA's management perspective and staff activities *do* affect local choices. Local staff take cues from state staff about the structure of program activities. In particular, state-level coordination of IV-B and IV-C activities, and the point of view represented by coordination of the Part C program with other state and federal efforts, is positively associated with local program coordination.[17] In other words, local Title IV officials are more likely to coordinate IV-B and IV-C activities when their counterparts at the state level have done so. This finding mirrors the belief of many SEA officials that USOE staff discouraged state-level consolidation through their own failure to consolidate federal-level program activities.

Interestingly, particular SEA IV-B and IV-C staff activities appear to have quite different effects on local efforts to coordinate Parts B and C. A high level of SEA IV-B staff involvement and influence over local project decisions, in addition to the perceived usefulness of state IV-B technical assistance services, promotes local coordination efforts. This finding accords with the interest in some states in making IV-B more of a focused program than an acquisitions service. Through consultation with local IV-B staff, state-level management and planning requirements, and provision of information and technical assistance, some state IV-B staff have actively promoted the concentrated and coherent use of local IV-B funds. Some SEA IV-B staff see local coordination of IV-B and IV-C projects as an effective way to increase the programmatic effect of IV-B.

The negative relationship among local coordination, SEA IV-C technical assistance, and level of involvement in local project activities reflects the association between SEA staff efforts and particular IV-C grant types. According to our survey data, SEA IV-C staff are most involved and their assistance rated most useful when they help districts formulate proposals for development grants. Development grants, however, are the least likely of IV-C grant types to be coordinated with IV-B purchases at the local level, both because most development projects are self-contained and because proposals for IV-C development grants typically face stiff funding competition. Local staff, as a result, hesitate to tie IV-B funds to developmental projects, both because funding is uncertain and because only a small portion

[17]State-level coordination of IV-B with other state programs does not represent, as we have argued earlier, SEA predisposition to general interprogram coordination. It reflects the presence of strong library interests at the state level concerned about the coordination of the library/media aspects of state programs.

Table 3.4

LOCAL-LEVEL COORDINATION OF IV-B AND IV-C

Item	Standardized Regression Coefficients
State-level management choices	
Extent of state-level B/C coordination	.50***
State-level coordination of IV-B with other programs	-.51***
State-level coordination of IV-C with other programs	.84***
State IV-B technical assistance activities	
Level of SEA IV-B staff involvement	.61***
Level of SEA IV-B staff influence on project goals	.00
Perceived usefulness of IV-B technical assistance	.87***
Types of IV-B technical assistance used	.11***
State IV-C technical assistance activities	
Level of SEA IV-C staff involvement	-.17***
Level of SEA IV-C staff influence on project goals	.14***
Perceived usefulness of IV-C technical assistance	-.89***
Types of IV-C technical assistance used	-.16***
School district characteristics	
Present district financial situation	-.06***
% district revenue from federal sources	-.08***
Average daily student membership	-.09***
District innovativeness	-.33***
Size of student enrollment decline	1.25***
Title IV project characteristics and policy outcomes	
Whether IV-B simplified administration	-.46***
Title IV rating: flexibility/sensitivity to local needs	.20***
Title IV rating: broad-based targeting of funds and services	.70***
IV-C grant size	.08***
Time spent planning/writing IV-C grant	-.16***
Whether all district schools participate in IV-C	.08***
Whether IV-B provides funds for staff development	-.16***
Whether district has grants-writer on staff	.18***

Significance levels: * = .10, ** = .05, *** = .01

R^2 = .57

Weighted N = 4651

of a district's students or teachers can receive benefits from IV-B funds if they are tied to a developmental effort.

SEA IV-C staff are generally less involved in local IV-C adoption grant proposals. In most states, local staff need do little more than identify which project from a state approved list they wish to adopt and demonstrate its relevance to the district by means of a needs assessment. District proposals to adopt a validated practice are much less competitive and well suited for coordination with IV-B funds because their funding probability is high and material needs are well specified. Furthermore, adoption grants usually affect more schools or classrooms, thereby spreading IV-B funds throughout the district. Thus it is not surprising that this regression model also shows that a high level of IV-B and IV-C coordination is present in IV-C projects that serve all schools in the district and that are funded at a slightly higher than average level. Furthermore, since projects available for adoption grants are

specified at the state level, the positive influence of SEA IV-C staff on project objectives is expected.

The data also show that certain types of districts are more likely than others to coordinate Part B and Part C activities. They are districts experiencing fairly severe budget cutbacks and a substantial (more than 10 percent) decline in student enrollment. They are also medium-sized districts that receive relatively little revenue from federal sources and that, by self-rating, are not innovative. Thus, districts that have the most to gain from a consolidated approach—those facing budget cutbacks and receiving fewer federal dollars—apparently have taken advantage of Title IV to do so.

Finally, there is a structural correlate to local-level coordination: the presence of staff or an office to prepare project grants. A number of local respondents commented that coordination of IV-B and IV-C projects took place because of the efforts of this staff. Respondents note that a single external grants staff serves to promote coordination and to prevent duplication of special project efforts and materials. Furthermore, just as state-level coordination of IV-B and IV-C reflects a more general management point of view, respondents point out that local-level program coordination also mirrors a local commitment to coordination of district activities under a single plan or integrated purpose. For example, one district Federal Programs Manager noted that "all federal programs are coordinated as much as possible to strengthen all areas of the total school program." Similarly, another said that "all federal funds are coordinated to provide support for the district's identified needs. Needs are established [and then] the appropriate funding source is tapped." Or, "[local project efforts] have all been part of a continuum identified by a master plan and supervised by auditors." A special project staff sees that this occurs.

In general, the level of local Title IV coordination can be explained by the same factors that explain the state-level response to Title IV: an administrative commitment to programmatic coordination, a perceived value derived from combining program resources, and the cues provided by the agency one step above in the educational hierarchy.

In addition to program coordination, the Title IV program set forth other policy goals for local projects. Consolidation of Title II, NDEA III, and the guidance and counseling component of Title III, together with a legislative guarantee of local discretion, was expected to increase the autonomy of IV-B officials in allocating funds and to simplify program administration. It was also hoped that the Title IV consolidation would result in more flexibility, greater sensitivity to local needs, and an increased ability to enhance school districts' organizational capacity. In this respect, Title IV is a response to the charge that federal programs hinder local efforts and often support locally irrelevant goals because of categorical mandates. Title IV provides an opportunity to see whether loosening categorical strings does increase local autonomy and flexibility and thus contribute more than other federal programs to building district capacity.

Local IV-B staff report that the program goals of increased autonomy and administrative simplification have been substantially achieved.[18] As Table 3.5

[18]The exact questions and frequency of responses were:

"One of the stated intentions of Title IV Part B was to provide for local autonomy and flexibility in the use of federal funds. To what extent would you say this goal has been achieved?"

shows, where autonomy was less than completely achieved, SEA IV-B staff activities had an important influence. A strong state role in IV-B is consistently and significantly associated with perceived loss of autonomy. Some locally perceived constraints appear to stem from state-developed management and planning requirements. However, they also result from state administration of federal regulations, such as insistence that funds be spent only on "eligible" objectives. The complaint of one local IV-B director was typical: "There are too many constraints on items and services that qualify for funding." It is worth noting, however, that while the most significant factor depressing local IV-B autonomy is a strong state role, this role is played by SEA IV-B staff that local personnel rate as highly competent.

Two other factors affecting local autonomy are of particular interest. One is the effort to coordinate IV-B and IV-C. In the 30 percent of districts that coordinate program components, IV-B officials apparently feel that IV-B funds have been "captured" by local federal programs managers, thus leaving them with less discretion in deciding about the use of IV-B. Conversely, when a superintendent takes an interest, local rating of IV-B autonomy goes up. Our fieldwork indicates that high superintendent involvement in IV-B often represents a strong central role in defining district priorities. Thus a high level of superintendent involvement is associated with a IV-B program that local staff see as addressing their districts' needs. For example, in one district the superintendent directed that all IV-B funds be used to support a pilot guidance program. In another the superintendent mandated that IV-B funds be used to support his program to strengthen library resources. In both districts, IV-B staff felt that the money had been used to accomplish something their district particularly wanted done, and consequently felt a great deal of autonomy in allocating IV-B funds.

How does Title IV compare with other federal programs on administrative flexibility and sensitivity to local needs? Over half of the local respondents rate Title IV higher or much higher than other federal programs on these policy outcomes. However, our fieldwork and open-ended survey responses suggest that this high rating should not be seen solely as a result of the Title IV consolidated program, but rather as an outcome of the relatively unconstrained policy strategies represented by Parts B and C. The regulations governing these programs changed little with consolidation. Most district staff see no substantive difference between Title IV and the categorical programs it replaced. Thus, it is likely that ESEA Titles II and III, and NDEA III would have received similarly favorable scores on relative

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Not at all — Completely

1% 2% 9% 40% 48%

N = 418

"Another objective of Title IV Part B was to simplify the administration of the former categorical programs consolidated by Title IV Part B. To what extent would you say that these goals have been achieved?"

Not at all — Completely

6% 3% 14% 48% 29%

N = 399

Table 3.5

FACTORS AFFECTING LOCAL IV-B AUTONOMY

Item	Standardized Regression Coefficients
State-level management choices	
Extent of state-level B/C coordination	-.43***
State-level coordination of IV-B with other programs	-.05***
State IV-B assistance and monitoring activities	
Level of SEA IV-B staff involvement in local choices	-.32***
Level of SEA IV-B staff influence on local choices	-.17***
Perceived competence of SEA IV-B staff	.41***
Timeliness of SEA IV-B technical assistance	-.09***
Usefulness of SEA IV-B technical assistance	-.31***
Number of SEA IV-B staff visits	-.34***
SEA IV-B staff project monitoring activities	-.09***
Local IV-B project activities	
Extent of nonpublic school official IV-B involvement	.20***
Whether school district targets to high-cost students	.33***
Whether district tried to coordinate B/C	-.05***
Importance of SEA IV-B allocation procedures to local IV-B choices	-.00
Local school board involvement in IV-B	-.01
Superintendent involvement in IV-B	.24***
District characteristics	
Present district financial situation	.22***
% district revenue from federal sources	.01
Size district student enrollment decline	-.19***
Average daily student membership	-.02**
District innovativeness	.12***
Title IV policy outcomes	
Whether IV-B simplified administration	.51***
Title IV-B rating: flexibility/sensitivity to local needs	.02
	R^2 = .43
	Weighted N = 4665

Significance levels: * = .10
** = .05
*** = .01

administrative flexibility and sensitivity to local needs. Nonetheless, the role and activity of state-level program staff have a significant effect on this local policy outcome.

A strong state-level IV-B role reduces perceived flexibility just as it did local autonomy in the use of IV-B funds, primarily because of state efforts to influence local allocation choices. Conversely, a strong state IV-C staff role contributes positively to reported Title IV flexibility and responsiveness. As we noted earlier, a strong IV-C state role in local IV-C projects usually accompanies local efforts to formulate and implement IV-C developmental projects, projects that typically are tailored to district needs and priorities. As the negative relationship between relevance of state-established IV-C priorities and this policy outcome suggests, perceived program flexibility and sensitivity are enhanced when local staff identify their own priorities, rather than model district objectives after those of the state.

Districts according Title IV high marks for flexibility and sensitivity have a

distinct profile. They are small to medium-sized with a stable student population and, consequently, a stable district budget. As a result, Title IV funds can be put to creative and developmental uses, as the high innovativeness rating suggests, rather than simply to fight fires. Conversely, districts with a substantial decline in student enrollment see Title IV, especially IV-B, as too restrictive. To this point, a number of local staff commented that requirements for IV-B funds to be spent only on eligible purposes, together with maintenance-of-effort regulations, prevent allocation of IV-B funds to areas of greatest need.

The Title IV program also receives high marks from local respondents on its ability to enhance the capacity and effectiveness of school districts. As noted above, it is likely that the categorical programs consolidated by the act would have received similar ratings. However, over half of our local respondents rated Title IV as more likely or much more likely than other federal programs to promote school districts' effectiveness. This local rating is positively affected by the more proximate outcomes of a consolidated policy: programmatic coordination, administrative simplification, increased autonomy, perceived administrative flexibility, and sensitivity to local needs. And, like these proximate policy outcomes, the ability of Title IV to enhance local organizational capacity and effectiveness is also influenced by SEA Title IV staff activities. Once again, a strong state IV-B staff role acts to reduce Title IV's perceived contribution to local capacity building, while a strong IV-C role enhances it.

However, different state-level activities have different effects and some exceptions to these general statements are worth noting. Local staff see SEA IV-B technical assistance as useful primarily when it clarifies program application procedures and program guidelines. The timeliness of this state-level assistance helps local staff to use Title IV more effectively. SEA IV-C technical assistance, on the other hand, typically is more programmatic—helping districts in planning and implementing their IV-C projects. Timeliness of state staff assistance, in this case, suggests a close SEA monitoring of local project activities and thus possibly less latitude for local staff to modify project activities to suit their own needs and expertise. Similarly, a high level of SEA IV-C staff involvement in specifying project objectives—a state role associated with adoption projects—apparently diminishes the ability of Title IV to enhance local organizational capacity, primarily because of the predetermined nature of IV-C adoption project objectives and activities. Local staff apparently feel that significant state involvement in specifying local project objectives makes the resulting IV-C activities less relevant to district needs than they could have been if local staff had been given a freer hand.

Local staff, in summary, do not see the role of state-level staff in holistic terms. They differentiate among state-level activities as more or less helpful to their particular needs. In general, for both Part B and Part C, local staff view state-imposed guidelines or monitoring as constraints, inhibiting their efforts to address issues of organizational capacity and effectiveness. State-level assistance in clarifying of program guidelines and formulating local development efforts, however, is seen as contributing significantly to building local capacity.

These local preferences pose a dilemma for state staff. SEA program staff often feel that a strong state presence is necessary to ensure uniform statewide project-quality standards, and they see Title IV as a way to address state priorities in the course of promoting particular local district goals. Some SEA staff also feel—

rightly or wrongly—that local personnel need strong guidance in making program choices. Local school officials, conversely, believe they can accomplish this objective with a freer hand, not with more guidelines. State and local staff apparently do not always agree on what is "best" for the district.

Finally, district size and financial situation do not influence the effectiveness of Title IV. Title IV appears to be no more or less appropriate for big or small districts or for wealthy or financially troubled school districts, all other things equal. To this point a number of respondents noted that the strength of IV-B and IV-C lies in their inherent flexibility. That is, the absence of substantive constraints permits different kinds of districts to identify program activities that suit their individual needs. However, even though the perceived effectiveness of Title IV is independent of district size and wealth, these data suggest that the full utilization of Title IV depends on the presence of another district attribute—innovativeness. Ironically, the policy characteristic—flexibility—that contributes the most to the effective use of Title IV also contributes to underuse of the program where local creativity is not present.

In summary, the local-level survey and fieldwork data support the assumptions underlying a theory of consolidation. Where school districts did coordinate programs, the managers were unanimous in citing its advantages. The consolidation represented by IV-B has increased both autonomy and administrative flexibility. The consolidated Title IV administrative package receives higher marks than other federal programs for administrative flexibility and sensitivity to local needs. Together, all of these proximate policy outcomes contribute, as consolidation advocates hoped, to a high comparative rating for the program's ability to strengthen school districts' organizational capacity and effectiveness. Yet, few districts tried to coordinate Parts B and C, and local decisions to do so were positively influenced by state-level response to the Title IV program as well as by a local predisposition to coordination. Thus, we cannot conclude that *Title IV as a consolidated program* promoted these policy outcomes. Local staff, by report and by observation, treat Title IV as they did the former categorical programs. The advent of Title IV merely encouraged local staff to think in terms of program coordination, where there w prior management preference for integration of special project efforts. Instead, the "consolidation outcomes" reported here are more accurately seen as characteristics inherent in the policy approach of both Title IV and its former categorical programs.

SUMMARY AND CONCLUSIONS

Clearly, Title IV does not offer a valid test of consolidation as an effective federal policy strategy. Despite some modest attempts at structural coordination, consolidation was never implemented at any level, and the former categorical programs retain their separate identities within Title IV. In the simplicity of its administrative procedures and sensitivity to local variation, Title IV comes closer to meeting the theoretical objectives of consolidation than does any other federal program. Yet these characteristics were also true for its categorical predecessors and are not a direct result of consolidation. Likewise, the Title IV experience provides little information about the political consequences of blurring categorical

boundaries. Although there has been limited competition between library interests and guidance and counseling representatives, Title IV has neither the visibility nor the well-defined and vocal constituencies characteristic of other federal programs such as bilingual education or programs for handicapped students.

Still, there are three important lessons to be learned from Title IV. The first might be called the "trickle-down" effect. Not only did USOE respond to Congressional cues, but each successive level of government has been strongly influenced by the actions of the next level above it. The absence of significant federal-level consolidation shaped the states' response. Similarly, local districts have followed the states' lead and made only minimal efforts at consolidation. However, to the extent that local coordination of IV-B and IV-C has occurred, it is positively associated with state coordination of IV-B and IV-C activities and of IV-C with other state and federal programs. This chainlike reaction suggests that, even beyond the formal rules and regulations that higher levels of government impose on those below them, an agency's management perspective also transmits strong cues. Hence, administrators need to ensure that their rule-making is consistent with their overall management philosophy and style.

The second lesson that Title IV illustrates concerns this notion of management perspective. Our state-level analysis indicates that, as expected, new structural arrangements resulting from Title IV do not necessarily lead to greater administrative coordination or programmatic cooperation. These occur only when management encourages interprogram coordination. In other words, organizational change does not stem from new structures that are imposed, but rather from an organizational environment that supports the underlying objectives of a specific change. The key variable in consolidation is not a structural one like the appointment of a Title IV director, but rather a management predisposition about program implementation. Consequently, the impact of consolidation or any other new policy strategy will differ depending on the kind of organizational environment into which it is introduced.

A final lesson of Title IV, focusing on differences across states and local districts, is elaborated on in the next chapter. In examining Title IV operations nationwide, it is clear that differences in the political and organizational environment lead to variations in program priorities and management strategies. Even if Title IV had been implemented as a consolidated program, the objectives of simplification and greater flexibility would have been achieved in varying degrees across the country. For example, school districts with strong state governments might have found themselves with just as many constraints under consolidation because the state would have imposed extensive regulations in an attempt to use federal funding to further its own aims. In this case consolidation would simply replace federal constraints with state ones and local districts would have no greater flexibility. On the other hand, districts in weaker states might gain greater flexibility, but lack the capacity to use it in building a coordinated program.

The question of whether program consolidation is an effective strategy for federal education policy remains an open one. At the same time, the Title IV experience illustrates the obstacles faced by such a policy reform.

Chapter 4

TITLE IV AND THE ROLE OF THE STATES

Besides describing Title IV operations and assessing its status as a consolidated program, a third purpose of this study is to use Title IV as a basis for understanding the role of the states in implementing federal education programs. Of particular interest is the extent to which state political and organizational factors affect federal program characteristics as programs pass through the state to local school districts.

Most implementation studies have focused on local jurisdictions, and while the insights they provide are useful, it is unclear how well they help explain state-level behavior.[1] We know from local-level analyses and available state studies that implementation is characterized by multiple actors, many of whom have the potential to alter or even stop the implementation process.[2] In this regard, state and local implementation processes are fundamentally the same. Beyond this, however, there is reason to believe that the two processes may differ markedly. For example, we know that fiscal control and programmatic authority are shared among more institutions at the state than at the local level. Consequently, different factors may shape implementation outcomes at these two levels.

Since Title IV is one of the most flexible of federal categorical programs, the states are relatively free to apply their own priorities and management strategies. In our eight fieldwork states, state approaches to Title IV administration vary greatly. At one end of the spectrum are states that have chosen to shape Title IV, particularly IV-C, to promote their own state priorities. Some of these states are highly prescriptive in dealing with local districts, while others have established a more collegial relationship. At the other end of the spectrum are states that administer Title IV basically as it comes to them from the federal government. They do not modify or reshape the program to suit local needs or to use it as a vehicle for promoting state aims. Because of this variation, Title IV can provide information about how states administer federal education programs in the absence of categorical constraints.

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[1]Despite the primarily local focus of implementation research, there are several perceptive state-level studies:

Martha Derthick, *The Influence of Federal Grants*, Harvard University Press, Cambridge, 1970; Helen Ingram, "Policy Implementation Through Bargaining: The Case of Federal Grants-in-Aid," *Public Policy*, Vol. 25, No. 4, Fall 1977, pp. 499-526; and Jerome T. Murphy, *State Education Agencies and Discretionary Funds*, Lexington Books, Lexington, Massachusetts, 1974.

Examples of local implementation studies include: Jeffrey L. Pressman and Aaron B. Wildavsky, *Implementation*, University of California Press, Berkeley, 1973; Martha Derthick, *New Towns In-Town*, The Urban Institute, Washington, D.C., 1972; and Paul Berman and Milbrey McLaughlin, *Federal Programs Supporting Educational Change*, Vols. 1-8, The Rand Corporation, 1974 and 1978.

[2]For example, Wildavsky (p. 102) describes the implementation process as a series of decision points, with each additional one lowering the probability of program success. Bardach goes a step further and characterizes the process as a "game" with a set of players, each having their own set of strategies and resources. (Eugene Bardach, *The Implementation Game: What Happens After a Bill Becomes a Law*, The MIT Press, Cambridge, Mass., 1977, p. 56.)

On the other hand, Title IV is much less visible and relevant to state political interests than other federal programs like those for handicapped students and compensatory education. Consequently, Title IV is not a particularly good program for understanding the effect of either the governor, state legislature, or interest groups on state management of federal programs.

However, together with our past research and the work of others, the Title IV study can help us identify the major sources of variation in state-level implementation. Although this chapter focuses on federal education programs and Title IV specifically, most of the analysis also applies to other domestic policies where grant programs have created a federal-state relationship.

There are three basic determinants of variation in state-level implementation:

- Federal choices as evidenced by legislative intent and subsequent administrative behavior;
- State-level institutional and political factors, such as the role and structure of the administrative agency charged with program implementation, and the role of state policymaking bodies, such as the legislature and governor's office; and
- State political culture or the larger context within which a policy is implemented.

In defining each of these factors, we are attempting to present a framework that can be used in studying state-level implementation generally. Where appropriate, we use data from the Title IV study; but some of the factors discussed are less significant for Title IV than for other federal programs. Consequently, this chapter is more general than previous ones and includes examples from federal programs other than Title IV.

Before examining these classes of independent variables, however, it is necessary to understand the dependent variable—policy or program implementation—and how it can vary. The next section examines the notion of implementation and illustrates how variation in its meaning can affect conclusions about its ultimate effectiveness.

DEFINING IMPLEMENTATION

Conclusions about whether a policy has been implemented, and judgments about the effectiveness of the process, often depend on the initial definition not only of "implementation," but also of "policy" and "program."

Some analysts use the terms "policy" and "program" interchangeably, and consequently describe their implementation in the same way.[3] Others, like Pressman and Wildavsky, distinguish between the two. They argue that policies imply causal theories and programs are the initial conditions that make these theories operational.[4] Such a definition ignores the fact that there can be multiple program options, all intended to achieve the same policy goal, and assumes that policies are inextricably linked to specific programs. Consequently, the failure to implement a given program is also a failure of the policy it embodies.

[3]Bardach, p. 36.
[4]Pressman and Wildavsky, pp. xiv-xv.

The Change Agent Study found that, where successful, implementation is characterized by mutual adaptation.[5] This evidence suggests that modification of a program during implementation should not be regarded as a sign of failure; in some cases, it promotes policy goals. Just as the original design of a program influences the behavior of those who must implement it, the program itself can be changed during the implementation process. Administrators and those who deliver program services may change program specifics to fit their own particular needs and circumstances. At the end of the implementation process, broad policy goals such as bilingual education or improved reading instruction may be operationalized, but through a very different program strategy from what federal and state officials originally intended.

This situation suggests the need for a more precise definition of "policy" and "program" and a clearer distinction between the two. For our purposes, *policy* is a statement of broad aims or purposes—for example, to provide additional services for handicapped students or to encourage practitioner-initiated innovation. Obviously, we have to be careful not to define policy aims so broadly that they become meaningless (e.g., to achieve educational equity). But regardless of its specificity, policy is intent, *not* effect. *Program*, on the other hand, is the effort to meet that intent. It is a strategy for achieving a particular policy aim, a set of specific resources, regulations, and management procedures. Consequently, there may be multiple programs that can be designed to achieve the same policy aim. By these definitions, policy implementation and program implementation are not necessarily the same. In fact, program characteristics may be radically altered during the implementation process, but the policy can remain intact.

Such a distinction has implications for those who study implementation. Often, they have defined implementation basically as compliance by lower levels of government with federal program regulations. Available evidence suggests that there may be a second dimension of federal policy implementation, which stresses programmatic development and examines how federal policy goals are defined in practice.

Compliance with federal program regulations is a rather limited and particular notion of implementation. It denotes only the extent to which minimal structures or routines have been established and followed. In fact, many would argue that mere compliance is insufficient to achieve federal goals. A program is more than rules and regulations and is implemented only when the original policy aims have been translated into concrete actions (i.e., program funds have been accurately targeted and effective services delivered to clients). A state's role in program implementation can mean little more than formulating guidelines and monitoring expenditures, or it can involve substantive program planning and the provision of resources and technical assistance to local jurisdictions. State-level implementation in this fuller sense involves programmatic development. This second dimension of the state role directs attention to issues such as level and type of technical assistance, frequency of contact with local jurisdictions, coordination of state and federal programs within state agencies, and level of staff expertise.

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[5]Paul Berman and Milbrey W. McLaughlin, *Federal Programs Supporting Educational Change, Vol. III: The Process of Change*, The Rand Corporation, 1975, pp. 3, 31.

Some states have modified their response to federal regulations to suit their own needs and level of expertise. If degree of compliance were judged in these cases, the states would get low marks indeed. However, an examination of program activities would reveal that the federal policy has been implemented, albeit with a different strategy from what the federal government intended. Similarly, it is possible that a full compliance response could have perverse effects for policy goals. For example, one state we visited during the course of our Title IV fieldwork has well-developed referral procedures for handicapped children. However, it found that significantly less service could be delivered to this target group once the state complied with the screening requirements set forth in the Federal Education for All Handicapped Children Act (PL 94-142).

Thus it is important for analysts and policymakers to acknowledge that a state's role in federal policy implementation is a *dual function* of its compliance response and program development concerns. Evidence of adherence to federal program regulations does not necessarily mean that policy aims have been translated into effective action. Similarly, the broad objectives of a federal policy can be implemented even though a state or local jurisdiction may modify program details, and thus not fully comply with federal regulations.

In sum, implementation is a multidimensional concept. In analyzing it, we should be clear about the differences between "policy" and "program," the possibility of there being many program strategies to achieve a particular policy aim, and the need to view successful implementation as more than compliance behavior. The following sections outline how three main classes of independent variables relate to these various dimensions of implementation.

THE EFFECT OF FEDERAL CHOICES

Regardless of a state's political and organizational characteristics, its response to a particular federal program depends at least partially on federal program choices as expressed in legislation and subsequent administrative regulations. Congressional intent is the first point at which variations in federal policy choices occur. A major theme of past research has been that in its efforts to balance conflicting interests, Congress often states its intent in a vague, and at times even conflicting, manner.[6] According to Ingram, the need to make legislation acceptable to diverse interests also explains why Congress may choose a grant program instead of a more coercive technique to further federal objectives.[7] Likewise, "when grant programs are included to make legislation more acceptable, there follows a tendency to be vague about objectives. . . ."[8]

The vagueness or ambivalence of Congressional intent has implications for both federal agencies and for state administration of federal grant programs. In his analysis of ESEA Title I, Murphy points out that Congressmen differed on whether

[6]See, for example, David B. Truman, *The Governmental Process*, 2d ed., Knopf, New York, 1971, p. 443.

[7]Ingram, pp. 505-506.

[8]Ibid., p. 507.

Title I was an antipoverty measure or a thinly disguised general aid-to-education bill.[9] He argues that:

> Although the language of Title I was clear as to eligible children, the bill's legislative history provided the semblance if not the reality of general aid. This confusion, and the fact that those reformers who had pushed for passage left implementation to lower-level officials, meant that USOE administrators could see in Title I what they wanted to see. Where there was vague language in the law, it also created later problems.[10]

An ambiguous legislative mandate meant that, in the early days of Title I, USOE did not have to stress or enforce targeting procedures that would make the program a compensatory, antipoverty measure. States followed USOE's lead and did not impose priorities on local school districts. Hence, it was not terribly surprising that some districts spent their Title I funds as general aid—even to the point of purchasing band uniforms and swimming pools.

Chapter 3's analysis of the Title IV consolidation also demonstrates how a lack of clarity in Congressional intent affects federal program administration and, in turn, state and local management. Congressional action prompted a chain reaction that extended down to local school districts. USOE responded to Congressional ambivalence about consolidation by not consolidating its operations. Largely as a result of USOE's orientation, the states do not view Title IV as a consolidated program, but as simply an amalgam of the prior categoricals. Both our survey and field data show that many states have simply followed USOE's lead and made little effort to consolidate either the goals or the administration of Title IV.

Federal program implementation clearly involves a complex process that extends beyond the issue of Congressional intent and administrative response. Although federal-level implementation is not the subject of this chapter, several of its other dimensions directly affect state program implementation. The first is the salience of a particular program to Congress and relevant interest groups. Congress and its various constituencies are more likely to scrutinize the administration of programs that are either highly controversial or very important to a group's interest. This suggests that the more salient a program is to Congress, the more closely Congress will hold the administrative agency accountable for program management. The administrative agency, in turn, will be more likely to enforce regulations and hold states accountable for these programs than for less visible or less politically contentious ones.

Several mitigating factors make this situation less predictable, however. First of all, David Truman notes that ambiguous legislative intent and unclear Congressional mandates most often characterize controversial legislation.[11] When legislation is controversial, administrators are also left to balance conflicting interests and resolve issues that were too difficult for Congress to handle. Consequently, while such legislation may intensify Congressional and interest-group scrutiny of administrative agencies, it is not clear what standards

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[9]Jerome T. Murphy, "The Education Bureaucracies Implement Novel Policy: The Politics of Title I of ESEA, 1965-72," in Alan P. Sindler (ed.), *Policy and Politics in America*, Little, Brown, Boston, 1973, p. 169.

[10]Ibid., p. 194.

[11]Truman, p. 439.

will be used or how specific the agency can be in imposing requirements on the states.

Despite the interest of some professional associations and nonpublic school groups in Title IV, it is not a highly controversial or much lobbied program. In fact, as we noted in Chap. 3, its legislative history suggests that the relative weakness of constituent groups made its component programs prime candidates for consolidation. Title IV's low political profile contrasts with that of more controversial programs, such as PL 94-142 and those designed to facilitate school desegregation.

A second constraint on federal agencies, regardless of the importance of the program being implemented, is their capacity to enforce any regulations they might impose on the states. For grant programs, the most severe sanction is the federal government's authority to withdraw or recover funds from states and local jurisdictions for noncompliance. But as a number of analysts have noted, this ultimate weapon is rarely used. In employing it, the federal government risks losing an important state ally and generating Congressional hostility.[12] Consequently, federal agencies usually choose to negotiate with a state or to bring public pressure against it by calling noncompliance to the attention of the media and relevant interest groups. Even short of using sanctions against the states, federal agencies must be able to impose requirements that make compliance verifiable and that are practical, given program objectives. As Derthick notes:

> Conditions must not be so demanding as to become an obstacle to the functioning of the program; at the same time conformance must be elicited sufficiently to sustain respect for federal authority and to insure progress toward federal goals.[13]

The clarity of legislative intent, the salience of a program to Congress and its various constituencies, and the capacity of administrative agencies to regulate state-level behavior are all constraints on federal program implementation. How federal officials choose to deal with these factors provides clues to the states about the flexibility they will have in implementing a program. Because the weighting accorded to each of these factors will vary by program and federal agency, states must estimate what their freedom of action will be. Tight federal constraints will suggest the need for a simple compliance response, while looser ones may allow the states more flexibility in shaping programs.

In making this calculation, states can draw upon past experience, usually on the basis of how a particular administrative agency has traditionally conceived of its role. For example, does the federal agency cooperate with the states as equal

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[12]See Ingram, p. 509, and
Carl E. Van Horn and Donald S. Van Meter, "The Implementation of Intergovernmental Policy," in Charles O. Jones and Robert D. Thomas (eds.), *Public Policymaking in a Federal System*, Sage Publications, Beverly Hills, Calif., 1976, p. 54.
This reluctance to use the most severe sanction against noncompliant states demonstrates the seemingly contradictory situation many federal agencies face. On the one hand, they exert some authority over states as a condition of providing them funds. On the other hand, grant programs depend on voluntary participation by the states. While it is usually unrealistic for a state to reject such funding, the implied threat of nonparticipation is always there. In addition, administrative agencies often need the states as allies in their dealings with Congress over budgetary appropriations and program expansion. For example, USOE is very careful to cultivate and maintain the support of the organization of chief state school officers.

[13]Derthick, p. 200.

partners, or does it attempt to force the states to do something that they would have done inadequately or not at all?

In education, this latter attitude has generated antagonism between states and the federal government. Our past research indicates that state and local officials acknowledge the legitimacy of federal initiatives to serve students whose special needs were previously neglected by states and local school districts. They also admit that federal efforts have been instrumental in changing state and local behavior.[14] However, in some instances the federal government has moved into areas where state programs already exist. Instead of viewing its role as a cooperative one, the federal agency assumes that its methods are superior and seeks to impose its own program specifications on existing state programs. For example, a number of states have well-developed special education programs and see the federal government as a "Johnny-come-lately" in this area. It was state action that prompted federal interest and not vice versa. Consequently, much of these states' opposition to the Education for All Handicapped Children Act (PL 94-142) stems from a belief that the federal government has no right to mandate the details of program implementation in an area where state programs, as measured by funding level or a longer record of accomplishment, are better established than federal ones.

It should be noted that Title IV is a major exception to this common complaint from state officials. As part of our survey, SEA federal program directors were asked to compare Title IV with the other federal programs they manage. An overwhelming majority consider Title IV to be more sensitive to state and local needs and to provide more flexibility than other federal programs.[15] In other words, states perceive federal Title IV administration as affording them sufficient latitude within which to implement their state program. Such a perception suggests that if states choose, they can rather easily move beyond a simple compliance response

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[14]Lorraine McDonnell and John Pincus, *Federal Aid to Education. An Intergovernmental Perspective*, The Rand Corporation, 1979, pp. 6-7.

[15]The survey question and frequency of response were:

"Compared with other federal programs you administer, how would you rate Title IV on:"

Sensitivity to State and Local Needs

Much less sensitive		No different from other federal programs		Much more sensitive
0	2.7%	18.9%	51.4%	27.0%

Administrative Flexibility

Much less flexible		No different from other federal programs		Much more flexible
0	2.7%	16.2%	73.0%	8.1%

N = 37

and shape Title IV to meet their own needs. From this perspective, Title IV presents a greater opportunity for state leadership than many other federal education programs.

A second dimension of federal agency role is how broadly the staff define their responsibilities. Even within the same agency, scope of defined responsibilities can vary greatly. The staff of some programs view their role as that of a funding conduit and thus emphasize fiscal accountability rather than program substance. Staff from other programs, however, hold strong beliefs about the focus and substance of the program they manage. Consequently, in monitoring state behavior, these staff members will go beyond the regulations to promote their own notions of how services should be delivered to students.[16]

This brief discussion of federal policy choices serves to illustrate major federal-level factors that structure state response to a particular federal program. As we shall see in subsequent sections, state-level factors can at times overwhelm federal factors. But to the extent that we observe variations in implementation processes and outcomes across programs within the same state, initial federal choices provide a partial explanation.

STATE-LEVEL INSTITUTIONAL AND POLITICAL FACTORS

Research on state-level implementation of federal policies has focused largely on the administrative agencies charged with managing federal programs. For example, Murphy emphasizes the importance of organizational culture in studying state-level policy implementation of ESEA Title V. He argues that intra-agency competition, bargaining, and standard operating procedures are significant to understanding how a state education agency will respond to new federal funding.[17] Derthick's study focuses on the role of the state legislature and governor's office in constraining agency behavior—even in cases where federal funds afford an administrative agency greater independence than it would ordinarily have.[18] Our own research suggests that while the organizational characteristics of an administrative agency are critical, its relationship with the legislature and the governor's office as well as with the larger political culture in which the agency operates is also important. As at the federal level, we need to be sensitive to variations in the significance of state-level factors across different programs.

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[16]The federal bilingual program (ESEA Title VII) and Title IV illustrate differences in the way federal agency staff define their responsibilities. Despite the unresolved debate over bilingualism versus biculturalism, and the belief by many local school districts that their programs should stress English language proficiency, not cultivation of a student's native tongue, the federal program has emphasized maintenance of a student's native culture and language even to the detriment of English fluency. (See, for example, Tom Bethell, "Against Bilingual Education," *Harper's Magazine*, February 1979, pp. 30-33.)

In contrast with Title VII and its strongly prescriptive standards, Title IV staff view their responsibilities as primarily fiscal: making certain that eligible students are served and that funds are spent in a manner consistent with program regulations. But federal staff avoid prescribing substantive priorities, and states and local school districts are permitted great flexibility in the kinds of programs they mount with Title IV funds.

[17]Murphy, p. 15.

[18]Derthick, p. 205.

The Role of the Administrative Agency Charged with Program Implementation

Two basic organizational variables affect state management style and the implementation of federal programs:

- The organizational structure of the agency—e.g., line/staff arrangements, functional organization, staff differentiation.
- Its role orientation in dealing with local jurisdictions—e.g., primarily as a funding conduit, as a regulatory agency, or as a provider of technical and implementation assistance.

Organizational Structure. An agency's structural characteristics can relate to federal program implementation in several ways. One important factor is the extent to which state-level staffing arrangements mirror those within the federal counterpart agency. Education policy provides a good example. As a result of the additional resources and responsibilities brought by the advent of federal aid, state departments of education have greatly expanded over the last ten years. Due to administrative money available from various categorical programs and to other funding, the federal government now provides between 30 and 80 percent of state education agency budgets. In many states, the advent of federal funding meant an extraordinary increase in the size of the agency; for example, one department of education we visited grew by more than 400 percent.

During their time of greatest growth, most state departments developed organizational structures which matched that of USOE and faithfully replicated, unit for unit, federal program categories. This type of organization resulted from a number of factors, notably the inability of state departments to engage in comprehensive planning, and to see the collective impact of all federal programs rather than the isolated effects of each individual program.

Not only are the structures similar, but state categorical aid directors often develop close working relationships with their federal counterparts. Although they are sometimes cast in an adversarial role with the federal government, these state directors become, in essence, federal allies.[19] They usually have more in common with their federal counterparts than they do with state department colleagues who work on different programs.

A few state departments of education, however, are organized along functional lines so that, for example, all language or all guidance and counseling programs are coordinated regardless of their funding source. The evidence indicates that federal agencies can expect SEAs organized along strict categorical lines to be more compliant in their implementation of federal programs. Federal policy aims will be implemented according to federal program regulations with little change or modification.[20] On the other hand, SEAs organized along functional lines will

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[19]Derthick, pp. 202-207, also discusses the role of state administrative agencies as federal allies.

[20]This hypothesis is subject to several caveats. First, we are assuming that the federal program in question is a categorical one with a clearly specified target group (as most in education are). However, in the case of a discretionary program that provides largely unfettered, general aid (such as ESEA Title IV-C Strengthening), then federal program requirements are minimal and we would expect to see competition and interagency bargaining regardless of the organizational structure. (See Murphy, p. 14.)

A second caveat is our assumption that most implementation decisions are made at the program director level. In cases where decisions must be "kicked upstairs" to officials with responsibility over

probably be less compliant, seeing a need to modify federal regulations to conform to broader SEA objectives and to make it easier to provide local technical assistance. Consequently, broad federal *policy aims* may be implemented by these departments, but they are likely to accomplish it with a *program strategy* different from what federal officials may have envisioned.

Most SEAs we visited in the course of the Title IV fieldwork largely reflect USOE's organizational structure. But even among those SEAs with a predominantly categorical orientation, some elements of the department may be organized on a more functional basis. For example, one large SEA we visited mirrors USOE almost exactly in areas related to the administration of federal and state categorical programs. At the same time, it includes a number of subject matter bureaus that deal with such curricular subjects as science, reading, art, and mathematics. Even though the categorical program bureaus do not enjoy a favorable reputation in most of the state's local districts, the subject matter bureaus are highly respected. Much to its credit, the state IV-C program has capitalized on the reputation of the subject matter bureaus by involving them in establishing program priorities and in selecting projects for funding. Existing IV-C projects also tend to call on appropriate subject matter bureaus for implementation assistance. As noted in Chap. 3, such interprogram coordination is positively associated with some of the most important effects of the Title IV consolidation. In sum, SEAs are organized according to two basic types, but these types should be viewed as two endpoints on a continuum rather than being mutually exclusive. Most SEAs are closer to the USOE organizational model than to the functional one. Still, an SEA management committed to coordination among discrete categorical programs can overcome structural constraints in order to deliver better-coordinated services to local districts.

Organizational Role. A second organizational variable affecting state-level implementation is the SEA's role orientation in dealing with local districts. Our research to this point suggests that if an SEA conceives of itself as primarily a funding conduit, it will emphasize compliance behavior to the exclusion of programmatic development. The state will require that local districts adhere to federal regulations, but will be unlikely to impose additional state priorities or to require that districts develop their own substantive priorities. We also find that such SEAs have little effect on local implementation outcomes; substantive program implementation choices fall almost totally on local districts. In these states the significant predictors of implementation outcomes are federal choices and local factors.

On the other hand, we found that states which try to shape federal programs to promote their own objectives have a more significant effect on the state and local implementation of federal policies than do states acting only as funding conduits. These states are more likely to formulate and then carry out policy aims of their own which can be superimposed on an existing federal program. They are also more likely to expect local programs to reflect state priorities.

Several examples from the IV-C program illustrate these differing state roles. One rural state we visited has a small, weak SEA that of necessity views its role

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more than one program, implementation decisions may more closely resemble those of agencies organized along functional lines. Officials with responsibility for more than one program have little or no fidelity to a Washington counterpart and are more apt to consider the broader interests of the state agency.

very narrowly. The IV-C coordinator there describes his responsibilities entirely in terms of processing grant requests and project reports; he does not deal with grantees on project content except insofar as it raises questions of budget or progress toward project objectives.

Other states conceive of their role much more broadly, and consequently tend to focus more on project content in their dealings with local districts. If a state's program priorities reflect local concerns and can be adapted to each district's specific situation, then such a strategy will be mutually beneficial for the state and local districts.

However, simply because states shape federal programs to meet their own interests does not necessarily mean that local needs are better served. If there is a mismatch between state requirements and local needs, the less-demanding funding conduit approach may actually work better for local districts. For example, one state in our fieldwork sample has been highly prescriptive in its management of the IV-C program. The state IV-C staff sees all projects in terms of a fixed cycle of development, validation, and adoption. They also clearly believe that IV-C funds should be used to underwrite only those projects that serve state priorities, not those that serve primarily local aims. These two objectives have created dissatisfaction at the local level. Funding was revoked from a project because it did not meet state-mandated criteria for development, but the local project staff neither shared the state's concerns nor fully understood them. In another project, highly professional special education personnel felt they were forced to make what they considered to be questionable modifications in order to secure continued funding. And in a third project, developers have argued that the steps required for validation and adoption destroy what they regard as the essential features of the project. In none of these instances are local personnel convinced that the state IV-C staff's system promotes the development of effective projects.

Technical Assistance. Most SEA staff responsible for managing state and federal programs provide some sort of technical assistance to local districts. Many times this assistance is an adjunct to the SEA's monitoring responsibilities, designed to ensure local compliance with program requirements. In some instances, however, SEAs choose to move beyond this narrow notion of technical assistance and attempt to provide school districts with assistance in resolving local problems more effectively. Such assistance assumes that SEA staff possess the requisite skills and that they can work with a district on a continuing basis. The amount and type of technical assistance an SEA provides local districts is, in effect, an intervening variable. It depends on the SEA's structure and on the way the department defines its organizational role. An SEA's technical assistance mode will then affect how federal programs are implemented locally.

The type of technical assistance an SEA delivers often depends on whether the department chooses to separate its monitoring function from its technical assistance role. This decision is largely determined by the organization of the department. If it is possible to establish a unit that can deliver technical assistance outside the categorical program structure, an SEA can then separate technical assistance from monitoring, and can also provide assistance that is not program-specific. Our fieldwork observations indicate that technical assistance tends to be more effective if it addresses problems that are common to more than one program. This is particularly true in states with smaller school districts that are organized and

function around a general curriculum, rather than around a series of categorical programs that may serve only a minority of the district's students. To the extent that state technical assistance addresses problems common to the district as a whole, the implementation of each individual program will be improved.

One state we visited during the Title IV fieldwork has been able to increase its technical assistance capacity significantly by establishing a separate technical assistance unit. Categorical program staff still provide some technical assistance, but this assistance focuses on specific program requirements. The technical assistance staff, meanwhile, act as a liaison between the state and local districts. Their assistance is process-oriented rather than either subject-matter-oriented or program-specific, and includes curriculum and staff development, assistance in obtaining outside funding, identification of consultants and evaluators, and assistance in management procedures and accounting practices.

Technical assistance consultants spend approximately one-half to two-thirds of their time in the field. They visit each local school district about once every two weeks and usually respond to requests at the level of curriculum directors or above, although they also work with classroom teachers.

When the unit was established, its director, with the support of SEA management, made it very clear that his staff would avoid monitoring above all else. It is his belief that someone else has to be the "cop" and that the staff's success depends on keeping a clear distinction between monitoring and service. In fact, technical assistance staff see school districts as their clients and themselves as advocates for local districts within the state department. Needless to say, this philosophy can create more than the usual jurisdictional problems with categorical program staff. In the beginning, categorical staff feared that they would become the "black hat" monitors, and the technical assistance staff would be the "good guys." Although these problems still exist, they are fading as the technical assistance unit becomes institutionalized and continues to win approval from local districts.

A number of larger states with more geographically dispersed populations have attempted to improve their technical assistance by establishing intermediate units or regional centers. These units vary greatly and range from SEA field offices to autonomous centers with the legal status of school districts. Some have been quite effective, while others raise serious questions about overlapping functions and wasted resources.

Six of the eight states we visited during our Title IV fieldwork have established some type of intermediate unit, most of them funded at least partially by Title IV. Our own observations and the assessment of local district respondents find that these units are more effective if they:

- Are an extension of the SEA rather than an additional layer of bureaucracy. Where they are independent entities, intermediate units tend to be more effective if they operate on a fee-for-service basis rather than with guaranteed funding.
- Avoid duplication of function with either local districts or other SEA units.
- Do not compete with local districts for funds.

Although intermediate units, entirely independent of the SEA, are usually governed by local boards of directors, they tend to be less accountable than those that are at least partially regulated by the state department. Not only is it difficult

to maintain service quality standards and coordinate intermediate unit activities with state priorities, but districts also report them unresponsive to local concerns. In cases where intermediate units have the legal standing of school districts, usually the only institution that can exert effective leverage over them is the state legislature. Some states have provided local districts with leverage over independent intermediate units by requiring the units to operate on a fee-for-service basis, rather than guaranteeing them a set funding level each year. In this way, intermediate units need to respond to consumer demand in the services they provide and are more likely to address local needs.

One of our fieldwork states typifies the problems that can arise when technical assistance functions overlap and lines of responsibility are unclear. The state has three intermediate units between the SEA and local districts. The first is a county-level system of elected officials who act as a liaison between the SEA and local districts. They distribute state funds to districts and also perform several regulatory functions. The second consists of SEA staff teams who operate out of regional offices and provide general technical assistance services. The third unit is designed to assist districts in adopting validated IV-C projects and also operates on a regional basis. Despite the competence of each individual unit, this tripartite arrangement has inevitably led to duplication of effort and some territorial jealousies. In addition, local districts tend to call the unit they are most familiar and comfortable with, regardless of whether it is the appropriate one for their particular problem.

Some intermediate units are funded as supplementary centers under IV-C and as such disseminate information on validated projects and assist local districts in proposal development. This function will become even more critical as more and more districts that have not previously participated in IV-C activities move to adopt validated projects. Since SEA administrative funds are very limited, such assistance seems like an appropriate function for intermediate units. In addition, some intermediate units, at the request of a group of districts, may run a IV-C project because it is more efficient to operate it on a regional basis.

In the course of our fieldwork, however, we saw some rather questionable examples of the use of IV-C funds by intermediate units. In one state we visited, intermediate units not only operate as supplementary centers, but also run regular IV-C development projects. Consequently, local districts have become very suspicious of the intermediate units. Although they are supposed to assist local districts in proposal development, the intermediate units often compete for the same funds. For example, one district currently operates a $48,000 IV-C gifted and talented project. At the same time, the intermediate unit in the region also runs a IV-C gifted and talented project at almost twice the district's funding level. The intermediate unit did not assist the local district in preparing its grant proposal, and now that the projects are operating, it will not work with the district or even exchange mutually useful information with it.

This example is not meant to imply that intermediate units should not receive IV-C funds. Our research suggests that they can play a very useful and critical role in disseminating information, assisting in proposal development, and operating large-scale regional projects. But intermediate units should not directly compete for funds with local districts; Such an arrangement results in duplicated effort and stirs up local district resentment of intermediate units. When this happens, the inter-

mediate units cannot work effectively with local districts and hence have defeated the primary purpose for their existence.

Policymakers and practitioners alike agree that technical assistance is an important component of a state's implementation strategy. How that assistance is provided, and its ultimate effectiveness, depend on the SEA's organizational structure and its role orientation toward local districts. Our research suggests that technical assistance can be provided more easily and effectively if it is clearly separated from program monitoring and focused on general problems rather than specific programs. But such a technical assistance mode necessitates that the SEA move beyond categorical programs as the sole basis for its organizational structure. It also means that SEAs must be willing to act as more than funding conduits or enforcers of program regulations. If an SEA can provide effective technical assistance either directly or through an intermediate unit, both the state and local districts will be more likely to go beyond a simple compliance response and use federal programs to meet their own needs and build greater organizational capacity.

The Role of the State Legislature and the Governor

The amount of SEA discretion in managing and shaping federal grant programs often depends at least partially on the role of the legislature and the governor's office. Most state legislators and gubernatorial staff admit that they know very little about the federal aid process in education. The extent of their awareness mostly reflects a fiscal rather than a programmatic concern; they want to make certain that their state is receiving its fair share of federal funds.

There is evidence, however, that this situation is changing. In a number of states, the legislature has recently decided that it must reappropriate all federal money coming into the state.[21] State legislatures traditionally have approved federal money with a virtual rubber stamp. Now, by closely monitoring the flow of federal funds, these legislatures believe they can determine whether or not the state will be able to maintain commitments begun with federal money if federal funding is terminated. In only a few instances have state legislatures refused to accept federal money already granted to the state. Nevertheless, the effect of this requirement has often been to delay the implementation of new federal programs by several months.

The decision of state legislators or a governor to involve themselves in the implementation of a federal program is largely political. These officials must weigh the political costs and benefits of intervention, particularly when the legal require-

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[21]The National Conference of State Legislatures estimates that at least forty legislatures now have some procedures for reviewing the expenditure of federal funds in their states.

Recently, the Governor of Pennsylvania asked the U.S. Supreme Court to decide whether a state legislature or the governor has control over federal funds that pass through the state treasury. He was joined in this request by 32 interest groups including the NAACP, the National Education Association, the American Federation of Teachers, and the National School Boards Association. (*Education Daily*, October 27 and November 17, 1978.)

Federal aid can provide the backdrop for a tug-of-war between the state legislature and the governor's office. The winner in such a struggle will depend on the constitutional powers accorded each institution, the role of the political party system, and the extent to which each can hold the allegiance of the state bureaucracy. (For a discussion of this issue, see Earl M. Baker et al., *Federal Grants, The National Interest and State Response: A Review of Theory and Research*, Center for the Study of Federalism, Working Paper No. 9, Temple University, Philadelphia, March 1974, p. 49.)

ments governing their participation are usually minimal (e.g., signing off on grant applications). A state legislator or governor needs to determine which interests care about a particular program and favor the official's participation in its implementation. For example, state policymakers are more likely to intervene in the implementation process if organized teachers favor their involvement than if a resource-poor client group favors it. Organized teachers are usually among the most influential interest groups in a state capital and tend to spend large sums of money supporting political candidates. Client groups, however, lack such resources as campaign funds and media access, and their size and the number of votes they can deliver are often unclear.

A state official's participation in implementing a program often depends on whether and how much it will further his or her political interests. The governors of two states where we conducted Title IV fieldwork provide interesting and contrasting examples. Both are politically ambitious and would like to run for the presidency some day. One of them has decided that it would be prudent for him to avoid educational issues. A member of his staff acts as a liaison with the SEA and sees to it that the governor's involvement in education is minimal and pro forma. The second governor has decided just the opposite. He campaigned on a platform promising better reading instruction for the state's students, actively participates in state education programs, and is trying to change targeting requirements for the federal ESEA Title I program. He believes that being known as the "education governor" will improve his chances in bidding for higher office.

The influence of state agencies on federal policy implementation is likely to depend not only on the degree of their intervention, but also on whether their concerns are substantive or fiscal. We would expect that when legislative and gubernatorial concerns are substantive, federal programs will become more visible and support for or opposition to them will strengthen. At the same time, substantive intervention by state government can also politicize a federal program and place greater constraints on those who must implement it.

If legislative or gubernatorial concerns are primarily fiscal, they are unlikely to affect the direction and content of a federal program. However, legislatures often express their fiscal concerns by pressuring administrative agencies to find ways to substitute federal funds for state funds. Title IV is not a highly visible program to legislatures and governors, but, as noted in Chap. 2, IV-C strengthening is the kind of program that state legislatures view as permitting them to spend less on SEA activities. Consequently, SEAs sometimes find themselves basing their allocation of IV-C strengthening funds on which areas of the department the legislature refused to fund. This kind of legislative pressure often makes it more difficult for SEAs to comply with federal regulations and to coordinate state and federal efforts. Consequently, in assessing the role of state legislatures and governors in federal policy implementation, one needs to examine both the extent and nature of their intervention.

Differences in State Political and Organizational Factors Across Federal Programs

Given that federal priorities and strategies as well as state concerns differ from program to program, we would expect state-level variables explaining federal

policy implementation to differ across programs, at least in their relative significance. For example, we know that various federal programs make different demands on states, and that the more visible ones are subject to greater scrutiny by state legislatures and governors' offices. Our study of Title IV indicates that Title IV is perceived as much easier to administer than either Title I or 94-142, the federal handicapped program. It is also less salient to legislators and interest groups than the other programs.

Our own research and the work of others suggest than even within the same policy area the significance of state organizational and political factors will vary, depending on specific program characteristics. Among the most important are:

- The visibility of a particular federal program;
- The number of "strings" or programmatic requirements attached to it;
- The extent to which federal program objectives conform with state aims;
- Perceived legitimacy of the federal government in this area;
- The size of the existing state commitment in a federal program area.

Just as program visibility affects federal-level implementation, it also constrains state officials. The more visible a program is, the more interest groups and state officials will scrutinize administrative operations. Unresolved demands of competing interests at the federal level may subsequently cause problems for state administrators. Such a situation is likely to weaken compliance with federal requirements, as state officials attempt to modify program strategies to accommodate state and local interests.

Despite the fears of some who expected the Title IV consolidation to spark intense state-level competition among affected interest groups, such a situation has not occurred. As we noted in our discussion of consolidation, Title IV has not promoted such competition because very little consolidation actually took place and most categorical interests remained intact within the new program. Furthermore, the programs selected for consolidation were picked primarily because their constituent groups were not strong or very vocal. Consequently, Title IV has not attracted either controversy or high visibility.

A federal program with a greater than average number of strings can affect state-level implementation in several ways. First, the more numerous and the more specific the programmatic requirements, the harder it will be for the state to develop its own program strategies. State officials may be able to comply with federal standards, but their inability to adapt the program to local needs may mean that it is less effective than it might otherwise be. On the other hand, to the extent that federal officials can enforce their program mandates, they can be certain that federal goals are being pursued.

A second way in which the number and scope of federal requirements affect state operations is by the demands they place on the standard operating procedures of an administrative agency. Even if states choose only a compliance response, a federal program can strain agency operations. Reporting requirements are a typical source of problems. For example, the federal government may require the state to demonstrate that federal funds are supplementing, not supplanting, state and local funds, but it may request the data in a form different from the way the state agency customarily collects it from local jurisdictions. Beyond the obvious effect such requirements may have on staff morale, the state agency needs to assess the

costs of changing its procedures to meet federal requirements as compared with risking noncompliance and the threatened withdrawal of funds.

Clearly, as our respondents noted throughout this study, Title IV is unique among federal programs for the modest requirements it imposes on states and local districts. SEA and local district officials feel they have greater than average flexibility in adapting the program to their needs and do not consider its administrative requirements an undue burden. Again, this contrast with other federal programs suggests that it would be valuable to go beyond Title IV in examining the interaction between federal program characteristics and state-level organizational and political factors.

State-level implementation also depends on the extent to which federal program objectives conform with state aims. Ingram argues that, through the grant bargaining process, federal agencies are more likely to win improvements in state organizational infrastructure than to change state action. For federal grants to affect state policy, there must be common interests [22] Again, we would expect more support from both administrative agencies and state policymakers when state and federal goals are similar, even if the two parties disagree over what the best program to implement them would be.

Federal grant programs have so thoroughly pervaded public policy that there are few issues today in which the legitimacy of the federal government's intervention is seriously challenged. However, perceived federal legitimacy constitutes a continuum, with one endpoint marking areas where most agree that the federal role is legitimate (e.g., construction of major highways, control and prevention of communicable diseases). At the other end are more controversial areas (e.g., some kinds of civil rights and affirmative action enforcement, areas of economic regulatory policy). In education, this continuum tends to represent not who is being served, but rather how close federal program requirements come to the classroom door. For example, the federal government recently had to abandon its efforts to establish uniform competency standards, because educators and parents argued that such standards would compromise state and local authority and empower the federal government to decide what should be taught. Where a particular federal program falls on this continuum of perceived legitimacy will affect state commitment to its implementation.

The extent of an existing state commitment in a federal program area can affect implementation in different ways. A heavy commitment means that the state has accepted these particular policy aims as important and is accustomed to working in this area. At the same time, the state may be very reluctant to accept a federal grant if it means modifying a state program that is already in place. This is particularly true when state funding exceeds the federal grant.

This discussion suggests that the significance and direction of various institutional factors will vary, depending on the characteristics of the program being implemented. Consequently, in assessing the role of the states in implementing federal education programs, we need to examine the full range of federal programs —those of high and low visibility, those with varying numbers of programmatic requirements, and those for which there is a prior state commitment as well as those for which there is none.

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[22]Ingram, pp. 513-514.

STATE POLITICAL CULTURE

Political culture is probably one of the most nebulous concepts used by social scientists. It refers to a distribution of popular attitudes that define how the people of a nation or state relate to the political system.[23] Political culture is the context within which policy is initiated and implemented. It includes popular attitudes toward local control and acceptance of higher levels of government, the political party system, the role of interest groups, and the legitimacy of other political institutions.

The concept is elusive, but states clearly have distinct political cultures that constrain the behavior of political and administrative institutions. For example, in one state we visited, the SEA established a unit to provide technical assistance to local districts across a variety of programs. The unit is staffed by competent and committed people, but it can expect only limited success because the citizenry entertains strong notions of local control and a distrust of higher levels of government.

The influential components of political culture may vary from one policy to another, however. For example, in examining education and welfare policies, popular attitudes toward social equity are relevant. In analyzing policies regulating labor unions or business activity, attitudes toward free enterprise are important. But attitudes toward local control and the proper role of state and federal government are central to any state-level implementation analysis.

States clearly differ in the relative predominance of state and local control. Two of the states we visited in an earlier study of grants consolidation are extreme examples.[24] In one, tradition and popular attitudes support local control so strongly that state agencies, including the SEA, exercise only weak authority over local jurisdictions. In the other, the state has great authority over predominantly small, rural, local jurisdictions that look to the state for resources and services they lack. The strength of the SEA is further reinforced by the state's authority to determine how local districts spend their state financial aid (i.e., state aid comes to local districts designated for a specific number of teachers, a specific number of textbooks, etc.).

Our interviews in these two states and in others have led us to conclude that popular attitudes toward local control and the proper role of state government have major effects on the federal aid process. These attitudes influence whether a state chooses merely to be a "check-writing" conduit for federal funds or whether the state decides to use federal program money to promote its own priorities. Weaker states tend simply to pass federal money along to local jurisdictions and to impose no restrictions or regulations other than those mandated by the federal govenment. Stronger states, in contrast, may impose additional regulations of their own as federal regulations permit them.

In states where notions of local control are strong, SEAs may have only minimal contact with local districts and impose few requirements on them. In such states, because citizens commonly distrust higher levels of government, SEAs often lack

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[23]Gabriel A. Almond and Sidney Veba, *The Civic Culture*, Little, Brown, Boston, 1965, p. 13.
[24]McDonnell and Pincus, pp. 10-11.

the resources and status to recruit good staff—again suggesting to them that they can and should only play a minimal role in local districts.

This noninterventionist strategy may work to the advantage of local districts if they are able to develop programs and solve problems on their own. Otherwise, notions of local control and district need come into conflict. One state in our Title IV fieldwork sample exemplifies this problem. Because the state encompasses many small, rural districts, the SEA established regional centers to assist them. At the same time, the SEA, sensitive to strong local control norms, provides these centers with little direction and makes no attempt to establish uniform service standards. Consequently, in regions where local districts have the capacity to direct the centers, they are well run. In other parts of the state, however, districts lack this capacity (and therefore need center resources more) and as a result, the centers are ineffective and suffer from a lack of direction.

In sum, state political culture strongly influences political and institutional factors that are central to understanding state-level implementation. The effect of state political culture on implementation outcomes is not direct, however. Rather, evolving through time, it steadily shapes and reshapes the relationship between state government and local jurisdictions, and the organizational role of state administrative agencies. These variables, in turn, explain how a state responds to a new federal program initiative.

SUMMARY AND CONCLUSIONS

This study of Title IV provides only limited information about state-level implementation. More extensive research comparing Title IV with other federal programs is needed. It is clear, however, that states vary substantially in their response to federal programs.

Title IV operations across the country demonstrate that we need to think of implementation as a multidimensional concept, that there may be multiple program strategies to achieve a particular policy aim, and that successful implementation can involve programmatic and organizational development as well as compliance by lower levels of government.

The legislative and administrative history of the Title IV consolidation indicates how initial federal choices can strongly influence subsequent state behavior. At the state-level, an SEA's organizational structure and its role orientation in dealing with local districts largely determine whether the state acts simply as a funding conduit, stressing only compliance, or whether it shapes federal programs to promote state priorities. Along with a state's political culture, these factors are also critical to the kind of technical assistance that SEAs provide to local districts.

Although Title IV is not highly visible or politically important to most governors and state legislatures, we know from other research that these policymakers will intervene in SEA implementation strategies if they view it as in their political self-interest to do so.

While these factors are not exhaustive, they include the most significant determinants of state-level implementation and indicate the importance of this level of government in understanding federal program outcomes.

Chapter 5

CONCLUSIONS

This study has focused on three aspects of the ESEA Title IV program: Title IV operations in states and local school districts, Title IV as an example of a consolidated funding strategy, and the unique role of the states in implementing Title IV and other federal education programs. This study supports the following general conclusions about Title IV:

- *Title IV is a popular, well-run program that is praised for its flexibility and ease of administration.* State and local program staff cite Title IV as a model federal program because of its minimal categorical constraints and procedural red tape. Additionally, federal staff receive high marks for their responsiveness and role in program administration.
- *Title IV did not result in a consolidated management of former categorical programs.* Most states and local districts manage IV-B and IV-C independently, as they did the categorical programs replaced by Title IV. Those states and local districts that consolidated Title IV management and program activities did so because of a preexisting management style that supports overall program integration. Where this management style was lacking, the Title IV regulations could not mandate any substantive consolidation.
- *States and local school districts vary significantly in both the substance and management of their IV-B and IV-C activities.* State and local program staff have taken advantage of Title IV's discretion to shape program activities to their particular and often quite different needs and management preferences. Variation in Title IV activities also stems from the "people dependent" nature of the program. In the absence of federal categorical constraints, state management of IV-B and IV-C depends on the interests of program staff, their expertise, and assessment of the program strategies most likely to enhance local practices. Similarly, local use of IV-B and IV-C grants depends heavily on district characteristics such as size, wealth, innovativeness, and local style of special project management.

  As a result, both the strength and weakness of Title IV lie in its flexibility. Title IV's programmatic discretion permits state and local staff to develop activities that respond to their needs much more effectively than a federally developed strategy could. However, federal and state directives merely target funds and articulate broad program objectives; local educators determine what happens next. Thus, if local commitment or expertise is lacking, Title IV funds can be underutilized, with IV-B becoming primarily a way to fill gaps in local purchasing and IV-C a target of financial expedience. In this case, IV-B and IV-C funds become a wasted opportunity and do little more than sustain the status quo.
- *Small IV-B and IV-C grants can induce substantial improvement in local*

practices. Small Title IV grants *can* play an important role in developing district practices and resources because they allow staff to tailor activities to local needs and because they often generate a high level of local commitment and enthusiasm. The freedom to specify project objectives, identify target groups, and devise project strategies often elicits a level of local creativity and interest that is not forthcoming when categorical strings diminish local sense of ownership and constrain choices. In contrast to other categorical programs (e.g., Title I for the disadvantaged or Title VII for bilingual education), where local officials often feel they are promoting the federal government's objectives, not their own, local staff tend to see Title IV activities as district-generated. An important observation of the study is that a small amount of money, plus local initiative, can accomplish a great deal. Practitioners explain the high benefit/cost ratio of small grants by their appeal to staff sense of professionalism and recognition of staff initiative and creativity. Futhermore, our fieldwork suggests that in rural areas, small grants can make an important contribution by bringing staff into a larger network and thereby reducing their sense of isolation. In view of the many practitioners, then, the dollar amount of a grant is secondary. Of primary importance are professional recognition, affiliation with a broader Title IV network, and legitimization of staff initiative.
legitimization of staff initiative.

- *Title IV participation of eligible nonpublic school students is uneven.* Nonpublic participation varies greatly between Parts B and C. The majority of eligible nonpublic schools receive IV-B services and find them appropriate to their needs. Only about one-third to one-quarter of IV-C projects include nonpublic students. Thus, federal requirements for equitable nonpublic participation in this program component are presently unmet. There is also a serious question about the quality of involvement for those nonpublic students that do participate in local IV-C activities; their participation is neither as extensive nor as sustained as it is for public school students.

These conclusions have clear implications for those who manage Title IV. The next section provides federal and state officials with concrete recommendations for future program directions.

IMPLICATIONS FOR FEDERAL POLICYMAKERS

Although the experience with ESEA Title IV is not a good test of the merits or costs of program consolidation, it suggests a number of requisites for a successful consolidation policy. First, it points out the instability of a consolidation built on *political* rather than *substantive* logic. In ESEA Title IV, Congress consolidated programs that offered little political resistance, not programs that were substantively or procedurally compatible. Consequently, in the view of many practitioners, Title IV program components are a jumble of "apples and oranges." Largely because of complaints from state and local staff, Congress enacted the 1978 amendments to ESEA Title IV (PL 95-561), which dismantled the central features of the

1974 consolidation. The single application will be discontinued, thereby ameliorating problems with artificially synchronized IV-B and IV-C timeliness. A proposed Part D will remove guidance and counseling from Part B, thus eliminating the funding battle between people and things. IV-C strengthening will be deleted from Part C and reinstituted in its former categorical structure, Title V. This change will relieve State Advisory Councils and SEA IV-C directors of oversight responsibilities for activities funded from the "chief's pot." In short, the Title IV experience demonstrates the importance of compatibility as a first condition for successful consolidation.

It also suggests that a second necessary condition for successful program consolidation is federal reorganization to reflect consolidated program objectives. At the federal level, Title IV was essentially a paper umbrella intended to cover former categorical activities. Though efforts were made to coordinate procedures between IV-B and IV-C staff, little substantive consolidation occurred. The absence of meaningful federal-level consolidation apparently influenced state program choices. Staff respond to signals from counterparts one step higher in the policy system and the signals SEA staff received from USOE staff were, at best, mixed. A number of state program staff commented that the absence of programmatic consolidation at the federal level dampened their interest in rethinking their own program management. With regard to this point, we found that where state officials did manage Title IV as a consolidated effort, local staff were more likely to coordinate their own IV-B and IV-C activities. Organizational responses to a new policy seem to trickle down through the policy system. The federal organizational response, then, is an important cue to state officials on whether they should seriously consider the objectives of a consolidated policy or whether they are free to continue their activities essentially as before.

A related lesson is that just as the federal response must represent substantive change, so must a consolidated policy represent more than a shuffling-together of prior categorical legislation. The Title IV legislation contained no new language to suggest Congressional commitment to a consolidated program effort, nor did it include incentives to encourage the institutional changes assumed by consolidation. Thus it is not surprising that state and local program staff saw Title IV as the former categorical programs under a new label, and reported that "nothing changed" as a result of Title IV. A categorical point of view is firmly entrenched at all three levels of government. In the absence of new incentives, categorical program staff see little to gain from dismantling their fiefdoms to become part of a broader consolidated effort. Yet breaking down categorical boundaries is central to the success of consolidation.

Finally, the Title IV experience shows that the effects of a consolidated strategy will differ according to the organizational environment into which it is introduced. Pro forma changes, such as naming a new program director or consolidating staff, can have no effect on day-to-day program operations if management is not committed to the goals of consolidation. It is difficult to mandate or legislate institutional change under almost any circumstances; but in the absence of a supportive federal response or the introduction of persuasive new incentives, state and local responses to a new policy such as consolidation will depend almost entirely on preexisting management perspectives.

IMPLICATIONS FOR FEDERAL PROGRAM STAFF

Title IV is well run, at least partly because of the efforts of federal program staff. Both SEA IV-B and IV-C staff give their respective federal counterparts high marks for overall management of Title IV and responsiveness to SEA requests.[1]

However, the Title IV program also exemplifies the changing interests and needs that arise as a federal policy matures.[2] In the early years of most federal education programs, federal staff must focus their attention on developing, interpreting, and monitoring program regulations. Once targeting and compliance mechanisms are in place and functioning well, federal staff can then turn their attention to substantive issues of program development. Maturation of a policy means that a great deal of learning has taken place both at the federal level and in the field.[3] SEA staff have identified efficient ways to implement Title IV regulations and more or less effective ways to manage the program. Furthermore, the discretionary character of Title IV means that institutional learning nationwide has been extensive and a broad range of management alternatives have been tried. The revised role for federal program staff, then, centers on improving overall Title IV program operations by utilizing the cumulative experience of Title IV staff across the country.

One way in which the Title IV program as a whole could benefit from this experience would be to increase SEA participation in the drafting of Title IV regulations. Presently, SEA staff's primary involvement is in the review of draft regulations prepared by federal program staff. This procedure is less effective than it might be, because many SEA staff do not believe that their comments will be taken seriously and therefore do not submit them. Additionally, federal program staff face tight deadlines in preparing the regulations and often cannot make all the modifications requested by practitioners. Our study indicates that at this stage in the program's operation, many of the best ideas about how to improve Title IV through regulation are found in the field, not at the federal level. Lacking significant input from SEA staff, federal program personnel risk drafting regulations that are insufficiently discriminating and may actually work against effective established practices.

A second way in which federal staff can improve overall Title IV program operations is to increase and recast their technical assistance role. Most SEA staff included in this study requested more—albeit different—assistance from federal program staff. SEA staff propose three general ways in which federal program staff could begin to plan a more active role in improving Title IV practices across the country: refocusing and increasing the number of USOE staff site visits; refocusing

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[1]State-level survey respondents were asked to rate USOE staff effectiveness in a number of areas: preparation of guidelines, response to telephone requests, annual conferences, and site visits. Fieldwork interviews also explored how SEA staff viewed USOE staff activities. The single exception to a consistently high USOE staff rating was the slowness of USOE written response to state requests for clarification of program regulations. SEA staff complain that although USOE staff are willing to give timely telephone responses to their questions, it sometimes takes months to receive an "official" written response, the result being planning delays or the initiation of activities based on misinterpretation.

[2]Although implementation of Title IV began in 1976, it was not a new policy from the perspective of state and local staff because regulations governing the former categorical programs were left essentially unchanged. In this sense, then, state and local experience with Title IV began when ESEA was first implemented in 1965.

[3]Title IV has been fortunate in the tenure of its staff. Most SEA IV-B and IV-C directors had extensive prior experience with Titles II and III, respectively.

and restructuring the national Title IV conference; and sponsoring regional Title IV meetings.

Many SEA Title IV staff commented that they would like federal program officers to visit their state more often, but to spend less time on compliance checks and more time on assessing the strengths and weaknesses of the state's program. Such visits would enable USOE staff to tell about the experiences of other states facing similar problems, to suggest management strategies that might work in the state, and to recommend individuals whom SEA staff could contact for assistance. SEA staff would also like USOE program officers to spend more time visiting local projects. They believe this would give USOE staff a better sense of the state's Title IV activities and allow federal staff to draw useful comparisons between the overall state program and other states' programs. As one SEA Title IV director commented:

> I don't see why we have to spend most of the site visit time on questions of compliance and accounting. I could send all of that material in advance and then [the USOE program officer] could respond to it at the beginning of the visit and be able to spend more time out in the districts. We could even talk about it driving around in the car. What I need is input from them about what is happening in other states.

SEA staff believe their programs could benefit from the exchange of information about program activities and funding strategies in other states—an exchange that federal program staff are in a unique position to facilitate. Without such a basis for comparison, many SEA program staff say they cannot be sure they are making the best choices for their own programs. For example, SEA IV-C directors have requested more information about how other states conduct the proposal and review process, evaluate local projects, disseminate information about effective practices, and promote nonpublic school involvement. SEA IV-C staff are interested in other states' methods of managing mini grants and adoption and development grants. SEA IV-B staff would like to know about existing models for state and local evaluation. They also are interested in learning about state efforts to bring coherence to IV-B projects through state-developed management and technical assistance strategies. For example, are there dissemination activities that local staff find useful and that promote better local choices about the use of IV-B funds?

Likewise, many SEA staff believe that the national Title IV conference spends too much time on issues of legislation and regulation. They point out that they can understand most program changes or summary statistics on their own, or can seek clarification by telephone. They would like for the conference to spend much more time on substantive management questions, such as the IV-C grant review process, and on issues such as dropout prevention, career education, and programs for the handicapped. SEA staff believe this type of program information is important in enhancing their expertise and enabling them to provide concrete guidance to local staff. In addition, SEA staff would like the national conferences to be more loosely structured, allowing more time for informal talk with colleagues from other states.

Finally, if the national Title IV conference is to be more useful to them, state Title IV staff argue that they should have more to say about the agenda and format of national meetings. SEA staff feel that although a central role for federal program staff was important when the program was first established, it is time for federal

staff to move to the background. State staff, they believe, are in the best position to identify important substantive areas; federal staff can make an important contribution by identifying individuals most able to provide appropriate assistance.

SEA staff also believe that federally sponsored regional Title IV conferences would be a useful forum for the exchange of program information, and would foster the development of regional Title IV networks. State staff believe that these meetings would help them establish contacts who could later serve as a sounding board and source of assistance.

In summary, the Title IV program has reached maturity, a stage at which the appropriate federal role becomes program improvement, not program regulation and oversight. The experience and expertise needed to improve overall program operations exist in the field. The task for federal program staff, then, is to facilitate the sharing of expertise within the Title IV policy system. By developing and supporting such a program network, federal officials can help themselves and state staff to benefit more effectively from cumulative Title IV experience nationwide.

IMPLICATIONS FOR STATE PROGRAM STAFF

Many SEA Title IV staff have begun efforts to mitigate the people-dependence of local projects and the resulting broad variation in project quality. In many states, SEA IV-B and IV-C staff have attempted to raise the overall quality of local projects through state-developed guidelines, program priorities, and management requirements. State officials believe that these efforts can help local staff to make better decisions about the use of Title IV funds and that, as a result, less program money will be wasted because of insufficient local expertise or interest. This Title IV state response is analogous to federal reluctance to cede categorical objectives to consolidation or revenue sharing. Quite apart from pressures of interest group politics, which bolster categorical program management, federal policymakers fear that the minimal gains obtained in some districts will be lost if categorical regulations are removed. Many federal officials acknowledge that those regulations may not call forth the best local effort, but they believe that they prevent the least effective.

Local officials in general respond similarly to both state and federal attempts to control local program choices. In the case of Title IV, we found that local officials rate Title IV lower on its ability to enhance local effectiveness, and IV-C efforts as less likely to continue, when state priorities strongly influence local program decisions. In part, local officials explain this apparently counterproductive relationship in terms of ownership: A strong state role makes the Title IV program "theirs," not "ours." As a result, local staff are less committed to program objectives and making optimal use of funds. Another more frequent explanation is that state priorities are not always relevant to local concerns. As a result, program activities sometimes represent efforts that are important to SEA staff but not to local personnel.

Thus, the flexibility inherent in the Title IV program raises an important policy dilemma. Many SEA staff argue that without a strong state role, Title IV funds will be misused in many districts; the program will lack coherence across the state; and opportunities to cumulate statewide expertise will be lost. However, many local officials contend that state priorities and management guidelines too often conflict with local needs or management routines. There is no simple solution to this policy

quandary; both state and local staff are right. It is true that many district staff are either unable or unwilling to make the most effective use of Title IV funds; technical assistance and state guidelines may possibly promote better local choices. However, if local officials do not share SEA staff assessment about the relative virtues of different program choices, apparent local gains are likely to be proximate and ephemeral. At the same time, it is also true that many districts need assistance in effectively utilizing special grant funds and that, without state involvement, even proximate accomplishments might not be seen. A number of local officials have correctly pointed out, however, that state priorities are irrelevant to their districts and that they have more staff expertise than exists at the state level. In this case, local officials probably will be able to make better use of Title IV discretionary funds on their own than they could with substantive state involvement.

One solution to this policy dilemma lies in rethinking the type of assistance and guidance provided by state staff. Many local personnel requested *more*, not less, assistance from SEA staff in managing their Title IV program, but they also urged technical assistance of a different kind. They proposed that instead of additional requirements and guidelines aimed at improving local projects, SEA staff should assume a facilitative role. Many IV-B directors, for example, expressed a desire for small state conferences in which IV-B directors could share ideas. Circulars or verbal descriptions from SEA staff, in their view, are insufficient. What is needed, they believe, is personal exchange among "people on the firing line" about what has worked in their district, how it was accomplished, and how various problems were resolved. Similarly, the IV-C directors in our survey and fieldwork samples requested that SEA IV-C staff provide information about other projects in the state and sponsor small workshops for staff who are implementing similar projects. Both IV-B and IV-C officials in many states commented that current statewide conferences and information sheets do not meet their substantive needs. Local staff believe that most state efforts are too broad to be useful in modifying present activities and in planning new ones. Further, they feel that a focus on issues of project application and accounting precludes needed substantive exchange. As one IV-B project director commented, "I don't find a meeting that focuses on administrative issues useful. I need to find out what people in other districts have been doing with their IV-B funds. I can get the other information back in my office on the telephone." A number of local Title IV staff suggested that even a newsletter for educators performing similar responsibilities would be beneficial.

The fundamental dilemma is not whether SEA Title IV staff should play a substantive role in shaping local project activities. Many local staff do need assistance to make the best use of Title IV funds and cannot "bootstrap" their way to more effective projects. The dilemma concerns the nature of the state role. Local staff argue that more guidelines and imposition of state priorities will not promote quality local projects. Further, as our examination of local continuation decisions suggests, paper guarantees or assurances are unreliable measures of local behavior and attitudes. Just as a mandate to consolidate program activities is by itself unlikely to elicit greater programmatic coordination in the absence of a compatible management perspective, neither is a state requirement for systematic IV-B planning likely to accomplish much where little local planning expertise exists. A strong state role can enhance local efforts; however, guidelines must go hand in hand with on-site technical assistance or other activities such as the substantively focused conferences suggested by practitioners.

Another possible state-level response to this policy quandary is differential administration—an approach that has already been implemented to some extent in a number of states. Recognizing that not all districts can effectively utilize IV-C development grants, many SEAs have used adoption grants and mini grants as a way to provide funds for districts to try out new ideas on a smaller scale and in a different form. This SEA shift has modified IV-C program objectives—at least implicitly—to include local capacity-building in addition to the development of innovative projects.[4] However, most SEA IV-C technical efforts tend to focus on districts that are implementing large developmental projects—districts that, from one perspective, need state assistance the least. Districts receiving mini grants or implementing adoption grants usually receive only brief SEA staff visits, and technical assistance usually focuses on the rudiments of grant preparation, not on broader questions of local planning and management capacity. NDN facilitators in many states provide a good example of how adoption grants can serve as an entree and starting point for more extensive discussions of local needs, problems, and possible solutions. A small IV-C grant could be used as the occasion to encourage district officials to begin to rethink their district practices and also to initiate an on-going relationship between state and local staff. SEA staff might also initiate activities designed to sustain the psychological benefits of small grants, such as mini grant alumni meetings and workshops in which former grantees explain their activities to practitioners initiating similar ideas.

The district-level institutional and individual learning associated with Title IV has been uneven. Only in recent years have small or rural districts participated in Title IV-C activities at the same level as urban or large districts. These smaller districts have less experience in the management of special projects and typically have fewer of their own resources to aid in local improvement efforts. The people-dependent nature of Title IV means that more effective local efforts will come about as a result of strategies that increase individual motivation and expertise—not more mandates or highly specified regulations.

As we indicated in Chap. 3, however, nonpublic school participation in Title IV is one area where SEA staff need to become more prescriptive. The extent and quality of nonpublic participation does not meet federal requirements, and the responsibility for improving the situation rests primarily with the states. At a minimum, SEAs have to inform local districts that their assurances of nonpublic participation in IV-C projects will be taken seriously and monitored carefully. As we suggested, the costs of such monitoring can be minimized if a random sample of IV-C projects is checked annually and a withdrawal of funds threatened when effective nonpublic participation has not been sought by local school districts.

SEA staff also need to generate a comprehensive census of all eligible nonpublic schools in their state and, in communicating with local districts, to name the schools that should be contacted.[5] Finally, nonpublic participation in Title IV could

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[4]Not all practitioners support this program shift. One IV-C director felt that the program should become even more competitive, and that IV-C grants should be awarded as a sort of Nobel Prize for outstanding local proposals. Other administrators argued that the competitive aspect of IV-C should be eliminated and that the funds should be dispersed on an equitable basis to all districts in a state.

[5]Once such a system is established, it should be relatively inexpensive to maintain and update if it is included in the SEA's computerized data bank and nonpublic schools are linked by code to the proper public school district.

regularly be included as a topic at statewide and regional conferences. But as with other aspects of Title IV, it should be treated substantively. Rather than merely reiterating the federal regulations, SEA staff should encourage public and nonpublic school officials to discuss concrete ways of increasing the extent and quality of nonpublic participation in IV-B and IV-C. The directors of IV-C projects with successful nonpublic participation could also brief conference attendees on strategies they have found to be effective. Unlike their handling of other aspects of Title IV, states and local districts have not yet fully complied with federal mandates for nonpublic participation, and must pay more attention to doing so.

In sum, Title IV has reached a stage of maturity that calls for a different approach to its management from what was needed fifteen years ago. Our study findings strongly suggest that, in dealing with the states, federal officials need to concentrate less on compliance mechanisms and more on substantive program development. A similar emphasis is appropriate for state officials working with local school districts. Because Title IV is people-dependent for its success, it is critical that effective networks composed of program officials from all three levels of government be established to exchange ideas and provide mutual support.

Appendix A

STUDY SAMPLE

A major concern in designing our sample selection procedures was to ensure that findings for state and local Title IV programs could be generalized to all states and districts, yet could still address important but different IV-B and IV-C distributional issues.

A number of factors constrained sampling options. First, because we needed to purchase and work with a fiscal tape for each state included in the sample, a fixed cost was attached to adding each state. Another important constraint was the need for an adequate sample of school districts in each state from which to draw valid inferences about the effects of SEA behavior and policy on local district activities and perceptions. In addition, school districts had to be selected within each state to represent differences in Title IV program participation. In particular, some districts receive IV-B funds only; others receive both Part B and Part C funds. It was expected, given the competitive nature of IV-C, that districts receiving IV-B funds only would differ significantly from districts participating in both program components. These concerns and constraints led to the design of a cluster sample of 600 school districts in 20 states, selected in two stages. The samples for nonpublic principals and superintendents were constrained to correspond to the sample of school districts and thus are not representative of the universe of nonpublic schools.

The following sections describe the selection process for the state and local sample, the identification of respondents, data collection, and case-weighting procedures.

Selecting States

All 50 states were included in the mail survey, so that analyses of state survey data are based on a full census rather than a population sample. A two-stage local district sample was drawn for more extensive analysis of state-local relationships.

During the first stage, 3 states were selected with certainty because each had made a unique and extensive effort to reorganize SEA staffing and management practices. Using the Finite Selection Model (FSM), the other 17 states were chosen with equal probabilities from the 46 remaining in the population.[1] (Despite these differential selection probabilities, a straightforward weighting scheme allows us to generalize from this sample to the whole population of state programs.) FSM, a sampling procedure developed at Rand, generates a stratified random sample when continuous variables are used as stratifiers.[2] By enabling more sensitive

[1]Hawaii was eliminated from the sample frame because its single school district could not have provided the variation necessary to assess the influence of SEA policies on district behavior. The District of Columbia, American Samoa, the Bureau of Indian Affairs, and the Trust Territories were also excluded.

[2]Carl Morris, "A Finite Selection Model for Experimental Design of the Health Insurance Study," *Proceedings of the American Statistical Association*, 1975, pp. 75-78.

selection criteria than the commonly used blocking and stratification methods, FSM produces a sample that is substantially more representative of the population than a simple random sample of comparable size. On average, linear parameter estimates are about 60 percent more efficient in models using these variables as explanatory components. The five variables included in the FSM were:

- Geographic region (North, Midwest, South, West).
- State's Title IV Part C funding strategy (i.e., percent of all districts in state receiving Part C funds).
- State average per pupil expenditure.
- Percent of state population living in metropolitan areas.
- Whether Chief State School Officer is appointed or elected.

Table A.1 shows sample and population measures for the five selection criteria and demonstrates that our 20-state sample provides an adequate basis for generalizing about state-level variation.

Table A.1

COMPARISON OF ALL STATES WITH STUDY SAMPLE

Characteristic	All States		Study Sample	
	Number	Percent	Number	Percent
Geographic region				
Northeast	9	18	4	20
Midwest	12	24	4	20
South	16	32	8	40
Mountain/West	13	26	4	20
Selection of Chief State School Officer				
Elected	18	36	7	35
Appointed	32	34	13	65

Characteristic	All States' Percentiles			Study-Sample Percentiles		
	Mean	10th	90th	Mean	10th	90th
Percent metropolitan population	58	17	86	62	23	86
Average per-pupil expenditures ($)	1338	1027	1662	1332	1030	1600
Percent of school districts within the state receiving Part C funding	28	5	58	30	5	54

SELECTING SCHOOL DISTRICTS WITHIN STATES

In the second stage of the sample, we selected school districts within states according to a procedure developed to meet three competing needs:

- Ensuring that we selected a sufficient number of school districts receiving IV-C funds in each of the 20 states to enable us to assess the effects of SEA policy on local IV-C operations;
- Ensuring that our sample of school districts receiving IV-B funds would be generalizable to the nation as a whole; and
- Calculating unbiased estimates of national program effects. For example, Part B findings are based on two sets of districts: those that receive both IV-B and IV-C funds, and those that receive only IV-B funds. Because of

the need to oversample districts receiving Part C funds, Part B results from these districts must receive reduced weight in analysis relative to those of the non-C-funded group.

These concerns led us to develop a set of procedures for selecting 600 school districts from the 20 sampled states. School districts within each of the 20 states were selected utilizing the Sequentially Controlled Markovian Random Sampling algorithm. With this technique, districts in each selected state were ordered by size of enrollment from largest to smallest, within each funding category (both IV-B and IV-C funding, IV-B funding only). The algorithm selects the rank of each district to be chosen from each of the ordered lists in each state.

The sample selection was constrained to select twice as many districts receiving both Part B and C funds as districts receiving only Part B funds (400 versus 200). The total number of districts selected in any state was weighted by total state enrollment. The number selected within states ranged from 12 to 62; the number selected with Part B and Part C funding ranged from 7 to 41; the number per state with only Part C funding ranged from 0 to 21.

To select the sample districts, a list of all districts in each of the 20 states was prepared from the ELSEGIS School District Universe file. This file contains district name, address, and size (Average Daily Membership and Average Daily Attendance). Since it was necessary to append the Title IV funding status of each district to this file, each state was requested to provide a list of districts receiving IV-B and IV-C funds.[3] These lists were hand-coded and merged with the ELSEGIS file.

For each of the 20 states, the ELSEGIS data were extracted, matched to the hand-coded funding data, and sorted by size and funding status. The ranks for selection developed by the sampling algorithm were applied to the sorted file, resulting in the final school district sample. This list contained the district address and USOE code number,[4] which could be used for matching additional district-level data and tracking sample response. For Part C projects, the project name was added to the file. In districts with two Part C projects, one project was randomly selected. In districts with three or more projects, two projects were randomly selected for inclusion in the sample.

Fieldwork sites that were not included in the sample were added to the questionnaire mailing list—a total of 15 school districts in 9 states.

In summary, the school district sample was drawn to be representative of school districts within the sampled states, and also to ensure adequate distribution of IV-B and IV-C program funds for analyzing state-local Title IV relationships. The two-stage sampling procedure generated a sample of school districts within the state sample that can confidently be used to generalize findings to all school districts.

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[3]These lists were used by Rand to prepare the sampling plan. At a later date, Rand acquired the Section 437, General Education Act, data tape. Inconsistencies between the two possible sources of funding identification, and the need to have project as well as district identification to mail Part C questionnaires, led to the use of Rand lists rather than the Section 437 data tape.

[4]USOE code numbers were removed at the end of the data collection activity to protect the identity of respondents. All files and raw materials containing identifiers were held and maintained under Rand privacy procedures.

IDENTIFYING RESPONDENTS

Having defined the study sample, the next step was to identify respondents. There were 11 different respondents at the state and local levels, and no centralized list of all possible respondents was available. Therefore, for each of the 11 state and local respondents, a mailing list was prepared from data collected by Rand for this purpose.

State-Level Respondents

At the state level, there were 6 respondents: Federal Programs Manager, Title IV Director, Part B Coordinator, Part C Coordinator, State Advisory Council (SAC) Chairperson, and a State Advisory Council Member. State directories provided a mailing list with the SEA's address. Some state-level directories included identification of the Title IV Director. In these cases we telephoned the Title IV Director to obtain the names of the persons responsible for each of the other SEA functions. The Title IV Director was also asked to provide the names and mailing addresses of all SAC members.

School District Respondents

All school districts selected for the sample, whether Part C recipients or not, were designated to receive a Federal Programs Manager questionnaire and a Part B Coordinator questionnaire. These questionnaires were mailed to the district designating a respondent's appropriate title. In a few districts, the Federal Programs Manager and Part B Coordinator were the same person. In some cases, that person completed both questionnaires; in others, one of the two questionnaires was returned uncompleted. Responses were then transferred from the completed questionnaire for all questions appearing on both instruments.

The IV-C Project Director questionnaire required additional identification to reach the desired respondent. In some states, the list of Part C projects supplied to Rand contained the project name, project director's name, and project director's mailing address. For other states, the list included only the project name. For 4 of the 20 states there were no available project lists, merely counts of projects or lists of districts with projects. In these states, we requested hand-prepared lists of local projects. In one state, however, it was necessary to call each district to prepare the mailing list.

Nonpublic School Respondents

The most difficult respondents to identify were nonpublic school principals and superintendents. The study design necessitated the selection of a principal in one Title IV-funded nonpublic school within the boundaries of each sampled school district. Where appropriate, superintendents of the nonpublic systems of which these schools were a part were also to be surveyed. Attempts would be made to balance the type of nonpublic school (by religion or affiliation) within each state according to the state-wide distribution of nonpublic school type.

However, we found that there is no central list of nonpublic schools or systems. In most states, the state school directory contains a section that lists nonpublic schools alphabetically. In a few of the states, nonpublic schools are listed in order by the public school district in which the school is located. Some states also include the county location of nonpublic schools.

A tabulation of nonpublic school types was prepared for each state to ensure a balanced distribution of schools. Then the list of nonpublic schools was reordered to match the sample school districts.[5] Where it was known that particular types of schools do not participate in federally funded programs (usually as a result of fieldwork information), all schools of that type were removed from the list. (Most of them are Seventh-Day Adventist, Amish, or Mennonite schools.) Unavoidably, nonetheless, the sample included some schools that do not participate in federally funded programs, since in most cases there was no way to identify this characteristic prior to questionnaire mailing.

The nonpublic sample schools were then selected. In states where some districts had no nonpublic schools, additional schools were selected from sample districts with the largest numbers of nonpublic schools.

Wherever possible, special schools were excluded from the universe. These schools include "day care centers," "nursery schools," or schools with small enrollments serving only one or two grades (e.g., a 9th grade school with 15 students). Nonpublic schools were matched to public school districts at the best possible level, given the inadequate information available for each state.[6]

It proved even more difficult to identify the superintendents of nonpublic school systems. The Catholic and Lutheran (Missouri Synod) superintendents could be identified from central lists of names and addresses. These lists also included some information on the geographic area included within each superintendent's territory. A list was prepared of Catholic and Lutheran superintendents whose territory included at least one sample public school district.

Contacts were made with other religious denominations in an attempt to identify system superintendents. It was possible to include a few additional religious system superintendents in this way. Some respondents are executive directors of central organizations in religious groups that are not as highly structured as the Catholics. In some cases, a single church may have a superintendent because it has five or six schools all within the same town; however, we found that the school district central office did not always know of these local superintendents.

Contact was also made with organizations of independent schools. Where possible, the executive director or current president was included in the sample for nonpublic superintendents. In some cases, a regional president was selected on the assumption that he or she was more likely to know about nonpublic school relations with school districts in the relevant geographic area.

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[5]For one state, a list was available of all funded nonpublic schools within each public school district. Addresses were then looked up in the telephone books. For another state, the list was prepared by calling each public school district in the sample. Addresses were also obtained from telephone books.

[6]Since some states have many districts within a given city, post office names and zip codes may be the best approximation of different district boundaries. An example is Stockton, California, which is the city name for two districts: Stockton and Lincoln.

In other places a district may include more than one city name—for example, the county-wide districts found in many states. Without county identification of nonpublic schools, some nonpublic schools would be overlooked because their mailing address includes a city name not readily assignable to a unique county.

Fieldwork Sites

The fieldwork sites were selected independently of the local sample in order to obtain a desired distribution on a variety of characteristics: size, innovativeness, metropolitan location, relative wealth, and IV-B and IV-C project characteristics. Final site selection was made in consultation with SEA Title IV program officials.

DATA COLLECTION

Data collection for the Title IV study included three activities: fieldwork, mail and telephone survey, and assembly of administrative records. The fieldwork provided a thorough view of the way Title IV operates in states and local districts. The mail and telephone survey provided information about program relationships and activities for a broad spectrum of state and local participants. The administrative records supplied data about the fiscal and demographic characteristics of states and local districts and reduced the need to ask descriptive questions on the survey.

Fieldwork

During the fall of 1978, we visited eight state capitals and three local districts in each of these states. Local data collection included interviews with the Federal Programs Manager, Part B coordinator, Part C project directors, nonpublic school principals, nonpublic school superintendents, representatives of independent schools, and other persons identified to be knowledgeable. Case studies, prepared for each state, provided the basic link between the fieldwork and the survey analysis.

Mail and Telephone Survey

The mail and telephone survey was conducted between October 1978 and March 1979. Questionnaires were sent, with two mail follow-ups to each identified respondent. A priority scheme was established to achieve a desired response rate in each questionnaire category for each sample state.

For the telephone follow-up, an additional questionnaire was developed for use when the Federal Programs Manager and Part B coordinator were the same person. This form included questions that were asked on both of the mail questionnaires, as well as the most important questions specific to each function. This alternative questionnaire was separated into its component parts for inclusion in the appropriate data files.

Response Rate

The response rate for each questionnaire is shown in Table A.2. The telephone survey strategy was designed to ensure at least a minimum response rate for each of the questionnaires, and a minimum response rate within each state for the school district sample.

Table A.2

QUESTIONNAIRE RESPONSE RATE

Questionnaire	Number Sent	Number Responded	Rate (%)
SEA—Federal Programs Manager	50	37	74
SEA—Title IV Director	50	42	84
SEA—Part B Administrator	50	49	98
SEA—Part C Administrator	50	41	82
State Advisory Council	100	82	82
School District—Federal Programs Manager	613	403	66
School District—Part B Administrator	613	423	69
School District—Part C Project Director	453	357	79
Nonpublic Principal	611	347	57
Nonpublic Superintendent	89	54	62

At the state level, 21 states had complete data for all six state-level questionnaires. At the local level, 216 districts were matched on all four questionnaires and 256 were matched on the three public school district questionnaires.

Administrative Records and Other Data Sources

This project relies heavily on administrative records, which were both matched to the survey data and also used separately.[7] Administrative record data were obtained from federal and state sources and from Title IV state plans.

Federally collected data included the ELSEGIS School District Universe, the Consolidated Program Information Report (1972 and 1973), the Section 437 Data Collection (1975, 1976, 1977, and 1978), and the 1970 Censuses of Population and Housing (adjusted to school district boundaries). These files provided a wide range of information about school districts.

Each of the sample states was asked to provide a copy of the computer file or worksheets it used in computing school district IV-B allocations. Other selected fiscal data were also requested for each local district. The Title IV state plans contain information on the Part B allocation formula and state-proposed expenditures. This information was hand-coded and merged with the state-level data.

In addition, three questions dealing with SAC characteristics were obtained from a separate survey of state advisory councils. Information about the number of SEA employees was obtained from the National Center for Education Statistics and also entered in the project data file.

[7]All survey results included the OE identification code until the files were completely merged. Use of this code as a respondent identifier greatly facilitated the use of administrative records in conjunction with survey data. On completion of the merge, the OE codes were scrambled to protect respondent identity.

Creating Case Weights

Prior to analysis, case weights, based on the sampling parameters, were created for all local-level questionnaires. To compute these weights, a questionnaire was matched with the ELSEGIS school district universe file, which includes all school districts in the 50 states. The universe file also includes variables measuring the number of students and metropolitan status of districts. States were then recoded into the four regions used in the study.

Sample response rates were calculated for region by district size (Average Daily Attendance greater than or less than 2000) and metropolitan status (in SMSA and/or city limits or outside SMSA). Cell sample response rates were used to determine case weights. (For example, if the cell sample response rate was 10 percent, the case weight was 10.) These weights were added to the questionnaire file, along with district descriptive information from the ELSEGIS universe file.

For questionnaires in which districts could have more than one respondent, the case weights were computed in the same manner for each cell. The weight assigned to a district appeared in the file. (A district that should have a weight of 16, for example, and appeared twice in the file, would receive a weight of 8.)

Appendix B

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